THOMPSON, HINE AND FLORY

1100 NATIONAL CITY BANK BUILDING

629 EUCLID AVENUE

CLEVELAND, OHIO 44114-3070

(216) 566-5500 · TELEX 980217

TELECOPIER (216) 566-5583

IN COLUMBUS, OHIO
100 EAST BROAD STREET
COLUMBUS, OHIO 43215
(614) 469-7200

IN PALM BEACH, FLORIDA
125 WORTH AVENUE
PALM BEACH, FLORIDA 33480
(407) 833-5900

IN WASHINGTON, D.C.
1920 N STREET, N. W.
WASHINGTON, D.C. 20036
(202) 331-8800 · TELEX 904173

WRITER'S DIRECT DIAL NUMBER

October 6, 1988

566-5820

RECEIVED
OHIO EPA

OCT 11 1988

DIV. of SOLID & HAZ. WASTE MGT.

Mr. Thomas Crepeau
Ohio EPA
P.O. Box 1049
Columbus, Ohio 43266-0149

Re: Withdrawal of Hazardous Waste Permit
US EPA ID No. OHDO77783603
Ohio Permit No. 02-18-0071

Dear Mr. Crepeau:

Synthetic Products Company, 16601 St. Clair Avenue, Cleveland, Ohio, 44110, would like to withdraw its application submitted for further licensure for a hazardous waste storage facility at their plant located at 1636 Wayside Road, Cleveland, Ohio, 44112.

Please find enclosed the closure plan which we would appreciate your reviewing and processing for approval. It is our understanding that Ohio EPA will notify the public.

Thank you for your assistance in this matter. If we can be of further assistance in expediting the closure, please do not hesitate to contact us.

Very truly yours,

Michael L. Hardy

MLH/jt
Enclosure

cc: John Sundermeyer
Synthetic Products Company

THOMPSON, HINE AND FLORY

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TELECOPIER (216) 566-5583

IN WASHINGTON, D.C.
1920 N STREET, N.W.
WASHINGTON, D.C. 20036
(202) 331-8800 · TELEX 904173

WRITER'S DIRECT DIAL NUMBER

September 29, 1988

566-5804

Mr. Edward A. Kitchen, Manager
Technical Assistance and
Engineering Section
Division of Solid and Hazardous
Waste Management
Ohio Environmental Protection Agency
P. O. Box 1049
Columbus, Ohio 43266-0149

Re: Synthetic Products Company
(USEPA I.D. No. OHD077783603;
Ohio Permit No. 02-18-0071)

Dear Mr. Kitchen:

Your letter of August 29, 1988, requests Synthetic Products Company to update its Part B Application dated October 21, 1985 in the event that intervening events require an amendment to the Application.

Because Synthetic Products Company intends to close its currently licensed hazardous waste storage area, and plans to request withdrawal of its existing permit for that facility, there is no need to update or process the Part B Application dated October 21, 1985. Synthetic Products Company anticipates that it will be sending its formal notification of its intent to close the licensed facility during the week of October 3, 1988.

If you have any questions, please feel free to call me.

Sincerely,

Michael L. Hardy

/mi
cc: Mr. Thomas Crepeau
Mr. George Hamper

THOMPSON, HINE AND FLORY

1100 NATIONAL CITY BANK BUILDING

629 EUCLID AVENUE

CLEVELAND, OHIO 44114-3070

(216) 566-5500 · TELEX 980217

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(407) 833-5900

IN WASHINGTON, D.C.
1920 N STREET, N. W.
WASHINGTON, D.C. 20036
(202) 331-8800 · TELEX 904173

WRITER'S DIRECT DIAL NUMBER
566-5793

August 1, 1988

VIA FEDERAL EXPRESS

Permit Contact (5EP)
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Re: Synthetic Products Company --
Purchase of the Synthetic Products Company Division of Plastic Specialties and Technologies, Inc.
Facility Location: 1636 Wayside Road, Cleveland, Ohio 44112
U.S. EPA Id. No.: OHDO77783603
Ohio Permit No.: 02-18-0071

Gentlemen:

On behalf of Synthetic Products Company, a Delaware corporation, and pursuant to 40 CFR §270.72(d), notice is hereby given of the purchase by Synthetic Products Company, on August 1, 1988, of the assets of the Synthetic Products Company Division of Plastic Specialties and Technologies, Inc., a Delaware corporation. Accordingly, Synthetic Products Company requests a minor modification of the above referenced permit to reflect the transfer of ownership of the facility.

Enclosed please find a copy of the revised Part A application and the current Part A application for the facility. The former owner, Synthetic Products and Technologies, Inc., will continue to meet the 40 CFR Part 264, Subpart H, Financial Requirements until the new owner has demonstrated compliance.

Please note that the name in which the permit is presently held, "Synthetic Products Company," will continue to be the corporate name under with the new owner shall operate. The new facility owner and the facility mailing address shall be:

Synthetic Products Company
1636 Wayside Road
Cleveland, Ohio 44112

It should be emphasized that Synthetic Products Company will continue to operate the facility in the same manner and with the same personnel as did the former owners.

Very truly yours,

Patrick J. Sweeney

Patrick J. Sweeney,
One of the Attorneys for
Synthetic Products Company

PJS:etm

Enclosure

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

JAN 23 1984

REPLY TO ATTENTION OF:

MEMORANDUM

Subject: RCRA Part B Permit, Dart Industries, Inc., OHD 077-783-603

From: Pierre Talbert, Assistant Regional Counsel

Thru: Mary Gade, Chief
SWERB

To: William Miner, Chief
Technical, Permits and Compliance Section


Redacted


Redacted


Redacted

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 1/6/84

SUBJECT: ORC comments made on permit and administrative record for SYNPRO, Cleveland, Ohio OHD 077-783-603

FROM: William H. Miner, Chief
Technical, Permits, and Compliance Section

TO: Mary Gade
Office of Regional Counsel (ORC)

Redacted

Redacted

Redacted

OCT 22 1983

MEMORANDUM

SUBJECT: RCRA Part B Permit: Dart Industries, Inc.

FROM: Pierre Calbert
Assistant Regional Counsel

THRU: Mary Cade, Chief
Solid Waste and Emergency Response Branch

TO: Bill Miner, Chief
Waste Management Branch

[redacted]

[redacted]

Attachment

OhioEPA

RE: Dart Industries
02-13-0071
OHD077783603

May 27, 1983

Mr. James Mayka
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, Illinois 60604

Dear Mr. Mayka:

Attached please find the fact sheet and draft permit for Dart Industries Inc., we have not included the attachments because U.S. EPA has a copy of the complete application. Please note that Dart has not yet submitted all requested information. They are still requested to submit a waste analysis for 6 of the 8 EP toxic metal parameters. Mr. Steffan, Dart Industries, has indicated that the information will be submitted as soon as possible. We do not believe that this information will require changes in the fact sheet or draft permit. At the present time, we have not added any special terms and conditions to this permit.

If you have any questions concerning this fact sheet and draft permit, please contact Laura Whitacre at (614) 462-8423.

Yours truly,

Paul Flanigan

Paul Flanigan
Engineering Section
Division of Hazardous Materials Management

PF/mm

Attachment

cc: Tom Carlisle
Tom Crepeau
Chris Frazier
Ken Westlake
Laura Whitacre

RECEIVED
JUN 01 1983
WASTE MANAGEMENT

RECEIVED
WASTE MANAGEMENT

State of Ohio Environmental Protection Agency
361 E. Broad St., Columbus, Ohio 43216-1049, (614) 466-8565

080-12

DIVISION OF SYNTHETIC PRODUCTS CO.
A DART & KRAFT COMPANY
16601 ST. CLAIR AVENUE, CLEVELAND, OHIO 44110

216-531-6010
TELEX 98-5494

May 20, 1983

Mr. Paul Flanigan
Div. of Hazardous Materials Management
State of Ohio Environmental
Protection Agency
361 E. Broad St.
Columbus, OH 43215-3878

Dear Mr. Flanigan:

The enclosed revised pages should be inserted into the Part B RCRA Application replacing the obsolete pages. These additions should answer all of your comments mentioned in your letter of April 29.

The comments on the "Closure Plans, Past-closure Plans and Financial Requirements" are answered here.

Your statement: The discrepancy between the closure cost-estimate of $16,600 listed on Table 6, page 94 and the cost-estimate of $57,876 listed in the financial test documentation must be explained or resolved.

Answer: Originally we submitted Part A applications for four (4) locations. Three of these filed were for protective filing only for our warehouse locations. The applications for these three (3) sites have been withdrawn. However, the figure of 57,876 was for the closure costs for all four (4) sites. The closure cost estimate of $16,600 is the correct one for the site we are applying for.

Your statement: Further, please explain why the June 23, 1982 financial test filing lists 6 facilities totaling $156,546, while the March 31, 1983 financial test submittal lists only two facilities totaling $79,500. Dart & Kraft has three permitted hazardous waste facilities in Ohio, in addition to two facilities having interim status with U.S. EPA.

Answer: The financial test documentation for June 23, 1982 was prepared for U.S. EPA Region V. The financial test documentation of March 31, 1983 was prepared by Dart & Kraft for 2 sites in Ohio (Synthetic Products and Electrochemicals). West Bend Co. was deleted from the 1983 documentation to Ohio EPA because it is in Wisconsin and was included in the first one to Region V U.S. EPA, and omitted from the one in 1983 because it is not in Ohio. Aztec Chemicals and Thatcher

080-11

COPY 2

Plastic Packaging were omitted from the 1983 documentation because these companies have been sold by Dart & Kraft. Hobart Corp. was omitted from the Dart and Kraft documentation because they are preparing their own financial test documentation.

If you should have any questions, please do not hesitate to call me at your convenience.

Yours truly,

SYNTHETIC PRODUCTS COMPANY

Roy A. Steffen
Director of Engineering

RAS:jcl

Enclosures

cc: Elizabeth Utley, U.S. EPA Region V
Chris Frazier, DHMM-NEDO
Chuck Fletcher, Synpro
File

OhioEPA

Re: Dart Industries, Inc.
OEPA #02-18-0071
U.S. EPA #OHD077783603

April 29, 1983

Mr. Roy Steffen
Dart Industries, Inc.
1636 Wayside Road
Cleveland, Ohio 44112

Dear Mr. Steffen:

Ohio EPA has revised its adequacy review comments. These comments supersede those comments that were mentioned in the April 5, 1983 letter to Mr. Neimes.

Once the attached comments are addressed, OEPA can write the draft permit. Please have your response to us in three weeks.

If you have any questions, contact Laura Whitacre at 614/462-8423.

Yours truly,

Paul Flanigan

Paul Flanigan, Manager
Engineering Section
Div. of Hazardous Materials Management

PF/kjl

cc: Ken Westlake, U.S. EPA, Region V
Elizabeth Utley, U.S. EPA, Region V
Tom Carlisle, DHMM-CO
Bill Skowronski/Chris Frazier, DHMM-NEDO
File #02-18-0071
Laura Whitacre, DHMM-CO

RECEIVED
MAY 2 1983
WASTE MANAGEMENT BRANCH

received
5-3-83

COPY 2

State of Ohio Environmental Protection Agency
361 E. Broad St., Columbus, Ohio 43215-3878

080-10

Richard F. Celeste, Governor
Robert H. Maynard, Director

Waste Analysis and Waste Analysis Plan Comments

Copies of EP Toxicity lab analyses of the waste streams should be submitted.

The parameters listed in the waste analysis plan should include the eight EP Toxic metals. Accordingly, the EP Toxicity Extraction procedure should be included in the plan.

Contingency Plan Comments

The phone numbers for the State and Federal emergency response teams should be included in the plan. The location and capabilities of any communication equipment and alarms should be included in the plan. Arrangements should be made to have the Emergency Coordinator on-call 24 hours per day.

During the April 7, 1983, facility inspection, facility representatives indicated that the emergency coordinators had changed. The Contingency Plan should be revised to reflect the change.

Preventive Procedures Comments

Protective equipment is listed, but, facility should indicate what equipment is used (or worn), if any, during drum filling and transferring.

Personnel Training Comments

During facility inspection on April 7, 1983, facility representatives indicated that training instructor had changed. The training records should be revised to reflect the change.

Topographic Map [40 CFR Section 122.25(2)(19)(X)]

Indicate the location of the nearest storm sewers/drains to hazardous waste handling areas.

Region V, U.S. EPA needs a 1-200' scale Topo map for their files also.

Process Information - Containers

State the condition of the storage drums, i.e., reconditioned, new, reused or recycled.

Closure Plans, Past-closure Plans and Financial Requirements

The discrepancy between the closure cost-estimate of $16,600 listed on Table 6, page 94 and the cost-estimate of $57,876 listed in the financial test documentation must be explained or resolved. Further, please explain why the June 23, 1982 financial test filing lists 6 facilities totaling $156,546, while the March 31, 1983 financial test submittal lists only two facilities totaling $79,500. Dart & Kroft has three permitted hazardous waste facilies in Ohio, in addition to two facilities having interim status with U.S. EPA.

DIVISION OF SYNTHETIC PRODUCTS CO.
A DART & KRAFT COMPANY
16601 ST. CLAIR AVENUE, CLEVELAND, OHIO 44110

216-531-6010
TELEX 98-5494

March 29, 1983

United States Environmental
Protection Agency
Region V
230 South Dearborn St.
Chicago, IL 60604

ATTN: Mrs. Elizabeth Utley

Dear Mrs. Utley:

Please find enclosed three (3) copies of the Flood Insurance map for our area. I have marked the location of our facility with a red triangle. I hope this completes all the information that you need for our Part B application. If you have any questions, please feel free to call.

The building to store the hazardous waste has been completed.

Sincerely yours,

SYNTHETIC PRODUCTS COMPANY

Roy A. Steffen

Roy Steffen

RS:jcl

Enclosures

FEB 16 1983

Tom Crepeau, Chief
Permits and Manifest Records Section
Division of Hazardous Materials Management
Ohio Environmental Protection Agency
361 East Broad Street, P.O. Box 1049
Columbus, Ohio 43216

Re: Dart Industries SYNPRO Division
Cleveland, Ohio
EPA ID #: OHD 077-783-603

Dear Mr. Crepeau:

We have determined that the RCRA Part B permit application for the above-referenced facility is complete. We are enclosing a copy of our letter to the facility advising them of this determination.

We ask that you perform a detailed technical evaluation of the application materials to ensure conformance with all applicable 40 CFR Part 264 standards. Please submit a "preliminary staff determination" (PSD) to us by April 25, 1983. The PSD should contain (a) a draft permit, (b) a "notice of intent to deny", or (c) a determination, with justification, that an additional specified period of time is necessary to complete the evaluation. The PSD should also include a fact sheet, or statement of basis, as appropriate.

Please contact Ms. Elizabeth Utley, the responsible person on my staff at (312) 886-6162, if you have any questions.

Sincerely yours,

William H. Miner, Chief
Technical, Permits and Compliance Section
Waste Management Branch

Enclosure

bcc: Jodi Traub, MN SED
Ken Skahn, Staff contact

5HW:~~Ken Skahn~~ Liz Utley:pg:2-3-83

(Bmr. 2/11/83)

	TYPIST	AUTHOR			CHIEF	TPS CHIEF	WM CH.	MD OR
INITIALS					DJB			
DATE	2/4/83	2-7-83			2/10/83	2/11/83		

OSD-31

	TYPIST			TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
INITIALS	PG		DJB			
DATE	2/10/83		2/10/83			

FEB 16 1983

Roy Steffen, Chief Engineer
Dart Industries SNYPRO Division
16601 St. Clair Avenue
Cleveland, Ohio 44110

Re: Dart Industries SNYPRO Division
Cleveland, Ohio
OHD 077-783-603

Dear Mr. Steffen:

This letter is to notify you, as required by 40 CFR 124.3 (c), that we have reviewed your Part B permit application and have now determined your permit application to be complete. This determination means only that all items required by 40 CFR 122.25 have been addressed. (It is necessary for you to supply this Agency with substantiation of your flood plain data on page 8 of your permit application by February 21, 1983, a flood plain map or calculations).

We now begin an "adequacy review", during which we analyze the technical aspects of the application, in depth, in order to make a tentative decision to either prepare a draft permit or deny the application. We will be working cooperatively with the Ohio Environmental Protection Agency (OEPA) throughout the course of this review. Please understand that either, or both, of our agencies may request additional information from you, if it is necessary to clarify, modify or supplement previously submitted material. Timely response on your part to any such requests should allow us to advise you of our tentative decision within 90 days of today's date.

Subsequent to that decision, either a draft permit or a "notice of intent to deny" will be publicly noticed and made available for public comment with an opportunity provided for a public hearing. After the close of the public comment period, our Agency will issue a final permit decision. The timing of public notice, and hearing, and final permit decision by our Agency may be scheduled to coincide with any similar activities being conducted by the State of Ohio Hazardous Waste Facility Approval Board (HWFAB).

Please contact Mrs. Elizabeth Utley of my staff, at (312) 886-6162, if you have further questions.

Sincerely yours,

William H. Miner, Chief
Technical, Permits, and Compliance Section

cc: Paul Flanigan, OEPA
Peggy Vince, HWFAB
Tom Crepeau, OEPA

OHD-5

Liz Utley

OhioEPA

Re: Dart Industries, Inc.
#02-18-0071
OHD077783603

January 10, 1983

Kathy Homer, State Implementation Officer
U.S. EPA, Region V
Waste Management Branch
230 South Dearborn Street
Chicago, IL 60604

Dear Kathy:

The Division of Hazardous Materials Management has conducted an administrative review of the Part B application submitted by Dart Industries, Inc. This application was reviewed for completeness pursuant to regulations published in 40 CFR 122.25, 124.3 and Part 264.

As indicated in the attached completeness checklist, several required items were not included. A brief discussion of the deficiencies is found on the attached comment page.

If you have any questions about our review, please call Laura Whitacre at (614) 462-8423.

Sincerely,

Paul Flanigan

Paul Flanigan, Manager
Engineering Section
Div. of Hazardous Materials Management

PF/lw/kjl

cc: Chuck Wilhelm, Chief, DHMM
Bill Skowronski/Dave Wertz, NEDO
Tom Crepeau/file, P&MRS, DHMM
Tom Carlisle, TA&WMS, DHMM
Laura Whitacre, ES, DHMM
Karen Heyob, ES, DHMM
Ken Westlake, U.S. EPA, Region V

080-30

DEC 9 1982

5HW-TUB

Mr. Tom Crepeau
DHMM - OEPA
361 East Broad Street
P.O. Box 1049
Columbus, Ohio 43216

RE: Hazardous Waste Part B Permit Application
Faci
Facility EPA ID #: BHD077763603
Facility Name: Dart Industries, Incorporated
Facility Address: 1636 Waydide Road
Cleveland, Ohio 44112

Dear Mr. Crepeau:

By now your office should have recieved a Part B application from the above referenced facility. The United States Environmental Protection Agency (U.S. EPA has an application from this facility currently on file.

Your agency is requested to perform a completeness check of the application, prepare comments, and draft a deficiency letter if appropriate. Please forward the filled-in checklist, review comments, and draft letter to this office by January 14, 1983.

Please contact Mrs. Elizabeth Utley, the responsible U.S. EPA person at (312) 886-6162, if you have any questions regarding the application.

Sincerely yours,

William H. Miner, Chief
Technical, Permits and Compliance Section
Te

bcc: Ken Westlake (SS)
Kathy Homer (SIO)
LaNita Warrable (versar)

5HW-TUB:Liz Utley:pg:12-8-82

	TYPIST	AUTHOR	PER CHIEF	STU #1 CHIEF	STU #2 CHIEF	TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
INITIALS		KM			KKS	WHM		
DATE	12-8-82				12/8/82	12/9/82		

DIVISION OF SYNTHETIC PRODUCTS CO.
A DART & KRAFT COMPANY
16601 ST. CLAIR AVENUE, CLEVELAND, OHIO 44110

216-531-6010
TELEX 98-5494

December 1, 1982

RCRA Activities
Part B Permit Application
U.S. Environmental Protection Agency,
Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

RE: EPA I.D. No. OHD077783603
RCRA Part B Application Submittal
Synpro, Division of Dart Industries, Inc.

Dear Sirs:

Enclosed please find three copies of the above referenced RCRA Part B Application to the U.S. EPA for a permit to operate a hazardous waste management (HWM) facility. This document has been assembled and formatted in keeping with the draft EPA report "A GUIDE FOR PREPARING RCRA PERMIT APPLICATIONS FOR EXISTING STORAGE FACILITIES". Synpro is hopeful that by preparing our submission in this manner, the application review and permitting process will be facilitated.

Please note that our Part A Application has been amended and included with the front matter of the Part B. Specifically, the container storage design capacity (S01) has been changed from 55,000 gallons to 4,400 gallons.

Sincerely,

Charles W. Fletcher

Charles W. Fletcher
Vice President, Operations

Enclosures

CWF:jcl

COPY

RECEIVED
12/14/82

OhioEPA

LW

Re: Dart Industries, Inc.
Ohio EPA I.D. #02-18-0071
U.S. EPA I.D. #OHD077783603

April 20, 1982

Ms. Kathy Homer
State Implementation Officer
U.S. EPA, Region V
111 West Jackson Blvd., 16th Fl.
Chicago, IL 60604

Dear Kathy:

The Division of Hazardous Materials Management is currently reviewing the Part B permit application submitted by Dart Industries, Inc. Our "preliminary staff determination" is that additional time will be required for the preparation of the draft permit. DHMM met with Mr. Roy Steffan and Carl Neimes of Dart Industries on April 7, 1983. At this meeting, the minor deficiencies of the application were discussed and Dart will be submitting additional information.

We are developing another deficiency letter as a result of our meeting on the 7th of April. A month should be sufficient time for Dart to respond to our request. Therefore, it is expected that DHMM will be able to prepare a draft permit and forward it to U.S. EPA no later than June 1, 1983.

If you have any questions concerning the review of this application, please contact Laura Whitacre at (614) 462-8423.

Yours truly,

Paul Flanigan

Paul Flanigan, Mgr.
Engineering Section
Div. of Hazardous Materials Management

PF/lw/kjl

cc: Tom Crepeau/file
Tom Carlisle
Bill Skowronski/Chris Frazier
Laura Whitacre

CALLed LAURA WHITACRE
To tell her that
June 1, 1983 WAS OK.
Please NO LATER.
We have to public
Notice by July 1, 1983.

OhioEPA

Re: Dart Industries, Inc.
OEPA #02-18-0071
U.S. EPA #OHD077783603

April 5, 1983

Mr. Carl Neimes
Dart Industries, Inc.
1636 Wayside Road
Cleveland, OH 44112

Dear Mr. Neimes:

Ohio EPA has completed the initial adequacy review of your Part B permit application. Your application was well written and will be adequate when you address the following. We will contact you to arrange a convenient time to meet and discuss our comments.

Comments

-A copy of the EP-toxicity lab analysis of the filter press solids should be included in the Part B.

-If the liquid stabilizer scrap is no longer generated at the facility, the waste analysis plan should be revised to reflect this.

-Parameters listed in the plan should specifically include the eight EP-toxic metals.

-The approved sampling protocol, used by the facility, should be cited in the application.

-Contingency Plan should indicate whether police, fire and rescue personnel have been personally familiarized with the layout of the plant. The phone numbers for the state and federal emergency response teams should be included in the plan. The location and capability of any communication equipment and alarms should be listed in the plan. Arrangements should be made to have an emergency coordinator "on call" 24 hours a day.

-Protective equipment is listed but facility should indicate what equipment is used, if any, during drum filling and transferring.

-The qualifications of the training instructor should be detailed (i.e., list the specific hazardous waste seminars attended and indicate who trained him in "all aspects of hazardous waste management."

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APR 08 1983
WASTE MANAGEMENT
BRANCH

080-8

-Stabilizer liquids should be deleted from Closure Plan and Closure Cost Estimate.

-Documentation identifying that the facility is not located within the 100-year flood plain is required (i.e., flood plain map). IN NOW

-State whether the drums are new, reused, recycled or reconditioned. NOT REQUIRED

-Indicate the location of each intake and discharge structure or state that it does not apply. Indicate the locations of the sewers/drains.

If you have any questions, contact Laura Whitacre at (614) 462-8423.

Yours truly,

Paul Flanigan, Manager
Engineering Section
Div. of Hazardous Materials Management

PF/lw/kjl

cc: Elizabeth Utley, U.S. EPA, Region V
Tom Carlisle, TA&WMS, DHMM
Bill Skowronski/Chris Frazier, NEDO
Laura Whitacre, ES, DHMM
File #02-18-0071

Dart Industries
(OHD 077-783-603)

Statement of Basis and Fact Sheet

I. Introduction

On May 19, 1980, (45 FR 33066) pursuant to the requirements of Section 3001 through 3006 of the Resource Conservation and Recovery Act, as amended, (RCRA or the Act), the United States Environmental Protection Agency (U.S. EPA) promulgated regulations to protect human health and the environment from the improper management of hazardous waste. Section 3005 of the Act and Code of Federal Regulations, 40 CFR Parts 270 and 124, establish a permit system governing the storage of hazardous wastes. Final regulations for storage facilities appeared in the Federal Register of January 12, 1981. These regulations enable U.S. EPA to issue permits for hazardous waste storage facilities in the State of Ohio which has yet to receive authorization to administer and enforce such permitting activities in lieu of the Federal program under Section 3006 of the Act. A facility which receives a RCRA permit shall comply with U.S. EPA regulations pertaining to design, operation, performance, accident prevention and prepardness, closure and financial responsibility. This Statement of Basis briefly describes the derivation of conditions of the draft permit in support of U.S. EPA's proposal to issue a RCRA permit for SNYPRO Div. of Dart Industries, Inc., 1636 Wayside Road, Cleveland, Ohio.

On May 20, 1983, SYNPRO Div. of Dart Industries, Inc. submitted its revised and complete application for a RCRA permit in accordance with 40 CFR Section 270.14. To receive a RCRA permit, a facility shall demonstrate compliance with applicable technical standards in 40 CFR Part 264 published on May 19, 1980, (45 FR 33221) and January 21, 1981, (46 FR 2848), as well as financial requirements published on April 7, 1982, (47 FR 15047) and April 16, 1982, (47 FR 16554). After reviewing Dart Industries, Inc.'s application, U.S. EPA has tentatively determined that the above standards and requirements have been met. The draft permit includes all of these requirements. The preamble to the May 19, 1980, and January 12, 1981, regulations explain the rationale for these requirements.

Also incorporated in the draft permit conditions are requirements for the facility to comply with the terms of its proposed Waste Analysis Plan, Prepardness and Prevention Plan, Personnel Training Plan, and Closure Plan. These items have been determined by U.S. EPA as necessary to comply with the technical standards governing the treatment and storage of hazardous waste.

II. Facility Description

Dart Industries, Inc. is the owner of the Synthetic Products Company (SYNPRO), a manufacturer of vinyl stabilizers and metallic stearates. In this business, the company stores hazardous wastes in containers. Impure non-saleable products and process wastes containing barium and cadium are stored in a 30' x 30' weather-tight metal building. The facility will be used for the temporary storage of hazardous wastes prior to disposal at a RCRA approved disposal site. There is no on-site treatment or disposal of hazardous waste subject to RCRA regulations.

III. Summary of Basis for Permit Conditions

The following section of the fact sheet provides a brief summary of the permit conditions in the draft permit. All citations of the regulations refer to the regulations as codified in Title 40 of the Code of Federal Regulations (40 CFR).

Permit Condition	Subject	Regulation (40 CFR)
I. STANDARD CONDITIONS	Effect of Permit	§270.4 & 270.30(g)
I.A.	Permit Actions	§270.30(f), 270.14, §270.42, 270.43, §264.112 & 264.343(d)
I.B.		
I.C.	Severability	Standard Practice
I.D.1.	Duty to Comply	§270.30(a)
I.D.2.	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3.	Permit Expiration	§270.51
I.D.4.	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5.	Duty to Mitigate	§270.30(d)
I.D.6.	Proper Operation and Maintenance	§270.30(e)
I.D.7.	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8.	Inspection and Entry	§270.30(i)
I.D.9.	Monitoring and Records	§270.30(j)
I.D.10.	Reporting Planned Changes	§270.30(l)(1)
I.D.11.		
I.D.12.	Anticipated Noncompliance	§270.30(l)(2)
I.D.13.	Transfer of Permits	§270.30(l)(3), 270.40 & §264.12(c)
I.D.14.	Compliance Schedules	§270.30(l)(5) & 270.33
I.D.15.	Twenty-Four Hour Reporting	§270.30(l)(6) & 264.56 (d)(i)(j)
I.D.16.	Other Noncompliance	§270.30(l)(10)
I.D.17.	Other Information	§270.30(l)(11)
I.E.	Signatory Requirement	§270.11 & 270.30(k)
I.F.	Confidential Information	§270.12
I.G.		
I.H.	Document to be Maintained at Facility Site	§264.13(b), 264.16(d) §264.53(a), 264.122(a) §264.142(a), 26473, §264.15(b)

Permit Condition	Subject	Regulation (40 CFR)
II. GENERAL FACILITY CONDITIONS		
I.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice (Not Applicable)	
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Location Standards (Not Applicable)	
II.I.1.	Required Equipment	§264.32
II.I.2.	Testing and Maintenance of Equipment	§264.33
II.I.3.	Access to Communications or Alarm System	§264.34
II.I.4.	Required Aisle Space	§264.35
II.I.5.	Arrangements with Local Authorities	§264.37
II.J.1.	Implementation of Contingency Plan	§264.51
II.J.2.	Copies of the Contingency Plan	§264.53
II.J.3.	Amendments to the Contingency Plan	§264.54
II.J.4.	Emergency Coordinator	§264.55
II.K.	Manifest System	§264.71, §264.72 §264.76, §270.30(1)(7), §270.30(1)(8)
II.L.1.	Operating Record	§264.73
II.L.2.	Biennial Report	§264.75, §270.30(1)(9)

Permit Condition	Subject	Regulation (40 CFR)
II.M.1.	Closure Performance Standard	§264.111
II.M.2.	Amendment to Closure Plan	§264.112(b)
II.M.3.	Notification of Closure	§264.112(c)
II.M.4.	Time Allowed for Closure	§264.113
II.M.5.	Disposal or Decontamination of Equipment	§264.114
II.M.6.	Certification of Closure	§264.115
II.N.	Closure Cost Estimate	§264.142
II.O.	Financial Assurance for Facility Closure	§264.143
II.P.	Liability Requirements	§264.147
II.Q.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148

Permit Condition	Subject	Regulation (40 CFR)
III. STORAGE IN CONTAINERS		
III.A.	Waste Identification	§270.13(i)
III.B.	Condition of Containers	§264.171
III.C.	Compatibility of Wastes with Containers	§264.172
III.D.	Management of Containers	§264.173
III.E.	Containment	§264.175
III.F.	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G.	Special Requirements for Incompatible Waste	§264.177

PART B DOCKET LOG

Please print

Facility SynPro Div. Dart Industries, Inc.

I.D. # OHD 077 783 603

Item No.	Item Date	Description	Item Filed*
080-23	8/29/83	Transcript of Public Hearing for Dart Industries	Folder 2
080-24	8/29/83	Public Hearing Attendees w/attachment	Folder 2
080-25	8/1/83	Public Service Announcement (WJW).	Sec 6
080-26	12/6/82	Transmittal Letter to U.S. EPA from Dart Indus. W/3 copies of Part B Application	Folder 2
080-27	11/8/83	Memo: to File from E. Utley, EPA RE: Response to ORC Comments	Sec 4
080-28	12-16-83	Test Results for EP Toxicity	2
080-29	3-15-84	Ohio Mailing List	Sec 6
080-30	1-10-83	Letter: P. Flanagan to Kathy Homer	Fer 2
080-31	2-16-83	Letter: W. Meier to T. Crepeau	Fer 2
080-32	10-22-83	Memo: P. Talbert to B. Meier	Fer 4
080-33	1-6-84	Memo: W. Meier to M. Hale	Fer 4
080-34	1-23-84	Memo: P. Talbert to W. Meier	Fer 4
080-35	4-13-84	Memo W. Meier to M. Hale	Fer 4
080-36	5-1-84	Responsiveness Summary package Cover letter, Responsiveness Summary, Appeal proced.	Sec 6
080-37	5-1-84	Final Permit	Sec. 6
080-38	5-1-84	Certification of mailing	Sec. 6

*Item filed in [illegible] by section.

Folder 4

PART B DOCKET LOG

Please print

Facility SYNPRO div. Dart Industries, Inc.

I.D. # OHD 077783603

Item No.	Item Date	Description	Item Filed*
080-1		Log	Sec 1
080-2	12-9-82	Transmittal Letter to OEPA/Miner to Crepeau	Sec 2
080-3	1-10-83	OEPA Completeness checks (OEPA & EHU)	Sec 4
080-4	2-3-83	Phone memo to Bob Cook from EHU/delegation to Roy Steffen	Sec 4
080-5	2-16-83	Completeness letter to Dart/Miner to Steffen	Sec 2
080-6	3-17-83	Phone memo to Roy Steffen from EHU re: Flood Plain Maps	Sec 4
080-7	3-31-83	Rec'd 3 Flood Plain Maps-sent one to OEPA permit writer-2	Folder 2 in Applications
080-8	4-8-83	Adequacy review from OEPA	Sec 2
080-9	4-20-83	Request from OEPA for extension to 6-1-83 - Granted	Sec 2
080-10	4-29-83	Revised Adequacy review from OEPA	Sec 2
080-11	5-20-83	Letter from Steffen to Flanigan-OEPA and	Sec 2
080-12	6-1-83	Page changes and a Topo Map filed in Application Draft permit from OEPA	
080-13	6-2-83	Request for Public Notice & Hearing Miner to Christenson	2
080-14	7-12-83	Statement of Basis (Public Review Copy)	Sec 5
080-15	7-12-83	Final Draft Permit (Public Review Cop) w/Attachments (Certification of Publication)	Sec 5
080-16	7-21-83	Public Notice (Public Review Copy) w/Attachments from Barbara Russell, U.S. EPA	Sec 6
080-17	7-28-83	Memo to L. Utley re: Public Notice and Hearing Date	Sec 6
080-18	7-21-83	Letter from Karl J. Klepitsch, U.S. EPA To Cleveland City Official and Ohio General Mailing	Sec 6
080-19	7-21-83	Letter from K. Klepitsch To Hqtrs, Wildlife, Coastal Zones etc.	Sec 6
080-20	9-15-83	Letter: Kent E. Kroonemeyer, U.S. Department of Interior Columnbus, OH to Karl Klepitsch, U.S. EPA	Sec 6
080-21	7-15-83	Advertising Order for Broadcast with announcement attached	Sec 6
080-22	7-27-83	Verification of Receipt of Public Review materials from Cleveland main Public Library	Sec 6

*Folder 1 is arranged by sections.

080-1

SYNPRO

SYNTHETIC PRODUCTS CO.
16601 St. Clair Avenue
Cleveland, Ohio 44110
(216) 531-6010
Telex: 98-5494

October 17, 1985

RECEIVED
OCT 22 1985
SWB - AIS
U.S. EPA, REGION V

Mr. Jim Mayka
USEPA Region V
Waste Management Branch
230 South Dearborn Street
Chicago, IL 60604

OHD077783603 6, TSD, PA
~~ILD042523621 6, TSD PA~~

Dear Mr. Mayka,

A copy of our revised permit applications is enclosed. This revision reflects the change in corporate ownership originally submitted on January 7, 1985 and revisions requested thereto as well as additional modifications to financial assurances for closure relating to information obtained since the original revision date.

Very truly yours,

SYNTHETIC PRODUCTS CO.

John C. Sundermeyer
Director of Operations

JCS/lb

cc: Tom Crepeau

RECEIVED
OCT 22 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

Change of o/o, decrease in design capacity noted in HWDMS 11/18/85 SJ

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F OHD 0777 83603

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

☐ 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: 8 | YR. 51 | MO. 10 | DAY 15

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. __ MO. __ DAY __

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☒ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.

2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	[illegible]	LITERS PER DAY	[illegible]	ACRE-FEET	[illegible]
LITERS	[illegible]	TONS PER HOUR	[illegible]	HECTARE-METER	[illegible]
CUBIC YARDS	[illegible]	METRIC TONS PER HOUR	[illegible]	ACRES	[illegible]
CUBIC METERS	[illegible]	GALLONS PER HOUR	[illegible]	HECTARES	[illegible]
GALLONS PER DAY	[illegible]	LITERS PER HOUR	[illegible]		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	4,400	G		7				
2					8				
3					9				
4					10				

I certify this to be a true and accurate copy of a document on file in the records of the Ohio Environmental Protection Agency.

By ____________ Date ______

Ohio Environmental Protection Agency
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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE, INCLUDE DESIGN CAPACITY.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: _____ Date: 4-15-87

Ohio Environmental Protection Agency
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IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K054	900	P	T03 D80	
	0002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	
X-4	D002				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY											
W	O	H	D	0	7	7	7	8	3	6	0	3		1	W		DUP					2	DUP	

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D005	150,000	P	S01	
2	D006				INCLUDED WITH ABOVE
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

I certify this to be a true and accurate copy of the original document as filed in the records of the Ohio Environmental Protection Agency.

By: [signature] Date 4-15-87

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EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

DESCRIPTION OF HAZARDOUS WASTES *(continued)*

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

I certify this to be a true and accurate copy of the [illegible] on file in the records of the Ohio Environmental Protection Agency.

By: [illegible] Date 4-15-87

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EPA I.D. NO. *(enter from page 1)*

	H	D	0	7	7	8	3	6	0	3	T/N/C	6

FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*						LONGITUDE *(degrees, minutes, & seconds)*								
4	1	3	3	0	1	9	0	8	1	3	3	0	3	7

I. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

13. NAME OF FACILITY'S LEGAL OWNER	14. PHONE NO. *(area code & no.)*
PLASTIC SPECIALTIES AND TECHNOLOGY	201-941-2900

15. STREET OR P.O. BOX		16. CITY OR TOWN	17. ST.	18. ZIP CODE
101 Railroad Ave.	G	Ridgefield	NJ	07657

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
TOM JENNINGS, PRESIDENT SYNTHETIC PRODUCTS CO.	Tom Jennings	10-15-85

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
TOM JENNINGS, PRESIDENT SYNTHETIC PRODUCTS CO.	Tom Jennings	10-15-85

CONTINUE ON PAGE 5

SECTION B

FACILITY DESCRIPTION

This section provides a general description of the hazardous waste management facility as required by 40 CFR S 122.25 (a). This description is intended to acquaint the permit application reviewer/permit writer with an overview of the facility. More complete details can be found in other parts of this permit application.

B-1 General Description (40 CFR 122.25 (a) (1))

Synthetic Products company, is located in Cleveland, Ohio. The street address is:

Synthetic Products Company
1636 Wayside Road
Cleveland, Ohio 44112

The mailing address is:

Synthetic Products Company
16601 St. Clair Ave.
Cleveland, Ohio 44110

This facility is a manufacturer of vinyl stabilizers and metallic stearates. Impure nonsalable products containing barium or cadmium become hazardous wastes classified as D005 and D006. These wastes can be generated before or after the filtering and drying operation. Approximately 50 percent of the hazardous wastes generated are in liquid form and the remainder are solid. Both forms are stored onsite in barrels at the designated storage area shown in Figure 1. The wastes are hauled away by a contractor to a RCRA-approved disposal site in Alabama.

The contact and party responsible for the hazardous waste management activities at Synthetic Products Company is:

John C. Sundermeyer
Director of Operations
(216) 531-6010

B-2 Topographic Map (40 CFR 122.25 (a) (19))

Figure 1 is a map showing the facility boundaries, building, waste storage area, parking lot and other details. Relief over the entire facility property is less than 5 feet. For further details see sheets 1, 2, and 3 of Appendix 1.

Land uses: The surrounding land-use areas are shown on sheet 1 of Appendix 1. A residential area lies east of the facility while light industry occupies the rest of the surrounding area. Zoning maps of the area may be obtained from the City of Cleveland, Ohio Planning Commission.

Hazardous Waste Management Boundary: The hazardous waste management facility at Synthetic Products Company consists of the drum storage area which has a capacity of 80 55-gallon drums (Figure 1). The entire facility, including the hazardous waste storage area, is located outside the 100 year flood plain. The only major body of water nearby is Lake Erie, approximately 1.7 miles from Synthetic Products Company's boundary.

Wind Rose: Figure 2 shows an annual wind rose of meteorological data collected from 1967 through 1971 at the Hopkins International Airport approximately 18 miles west of the Synthetic Products Company facility.

Access Control: The facility is surrounded by a 6-foot chain-link fence topped by 3 strands of barbed wire. Employees enter through the main gate (Figure 1), park in the employee parking lot, and enter the building through a side door on the South wall of the building. Materials delivery and hazardous waste pickup vehicles enter and exit through the rear gate only. There is a locked gate located on the eastern facility boundary. Access control is discussed in further detail in Section F-1A.

Injection and Withdrawal Wells: The site has neither injection or withdrawal wells. No other wells are located on-site or off site within 1000 feet of the facility.

Buildings; Treatment, Storage, and Disposal Areas; Other Structures: Figure 1 shows the building and the waste storage area. These are the only structures at the site.

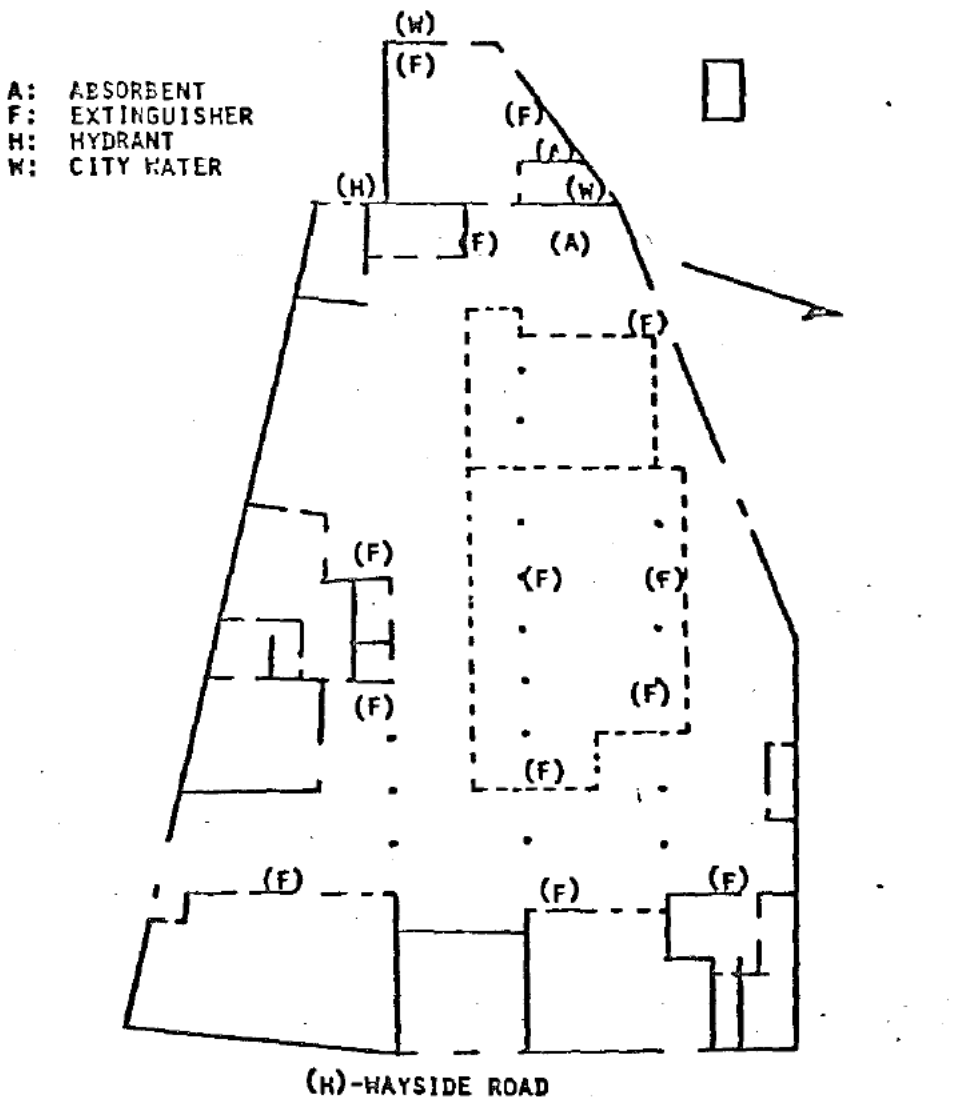
Recreation Areas: Not applicable.

Runoff Control Systems: A combined sewer system with collection drains located throughout the facility collects runoff from the manufacturing facility (Figure 1). Currently, the storage area is paved and drums are stored on pallets. Plans have been made to prevent runoff from the storage area and contain any leakage from the drums. The scheduled date for this system to be operable is December 21, 1982. Section F-4b discusses runoff control in greater detail.

Access and Internal Roads: Figure 1 shows plant access locations and the internal road going from the employee parking lot to the rear area of the facility. The internal road is not

SYNTHETIC PRODUCTS COMPANY
1636 WAYSIDE ROAD
CLEVELAND, OHIO 44112

ABSORBENT STORAGE - HYDRANT - FIRE EXTINGUISHER



7/16/80 WPH

Figure 3. Fire control facilities.

SECTION E

GROUNDWATER MONITORING SYSTEMS

The requirements for groundwater monitoring are not applicable to Synthetic Products Company which is a storage facility and stores hazardous waste in containers which is disposed of off-site.

Unauthorized visitors are not permitted to enter the London Road gate. The employees gate on Wayside Road is locked when the plant is shut down and when employees are not using the gate.

Entry to the hazardous waste container storage building is controlled by authorized key holders. There are four individuals at the facility who will be issued keys to the storage building. They include the Maintenance Foreman, Production Manager, Manager of Engineering and the Director of Operations. No other personnel are permitted to enter the container storage building without being accompanied by one of the key holders.

F-1a (3) Warning Signs

Signs which are legible from a distance of 25 feet are posted on the building door and on each side of the container storage building and several other locations around the active portion of the facility; these signs are visible from all angles of approach and bear the legend "Danger - Unauthorized Personnel Keep Out".

F-1b Waiver

Synpro does not request a waiver of the requirements stated in Part 264.14(a)(1) and (2) regarding injury to intruder and violation by intruder.

SECTION G

CONTINGENCY PLAN

The information contained herein is submitted in accordance with the requirements for a Contingency Plan, as contained in 40 CFR § 122.25 (a) (7) and § 264 Subpart D.

CONTINGENCY PLAN (40 CFR 122.25 (a) (7))

The intent of § 264, Subpart D (Contingency Plan and Emergency Procedures), of RCRA is to ensure that facilities that treat, store, or dispose of hazardous wastes have established the necessary planned procedures to follow in the event an emergency situation should arise.

The intent of the requirements under 40 CFR §264, Subpart C (Preparedness and Prevention), which was described in Section F, is to ensure that the facility is properly designed and equipped to minimize the possibility of accidents and prevent the occurrence of emergency situations. The requirements under 40 CFR § 264 Subpart D address the actions that are to be taken if an accident should occur.

G-1 GENERAL INFORMATION

This contingency plan is for the Synthetic Products Company, located at 1636 Wayside Road, Cleveland, Ohio 44112. Synthetic Products Company is primarily a manufacturer of heavy metal soaps.

and PVC stabilizers. T.C. Jennings is the President and General Manager of Synthetic Products Company and his work phone number is (216) 531-6010. J.C. Sundermeyer is the Director of Operations and his home telephone number is Redacted [redacted]. J.C. Sundermeyer is the primary emergency coordinator at the facility and may be reached at (216) 531-6010 from 8 a.m. to 5 p.m. on weekdays. Other emergency coordinators may be reached at this telephone extension during other hours. Details on this are found in the following section.

Synthetic Products Companys' hazardous waste is in containers in one location. The container storage area has a maximum storage capacity of 80 drums. A general site plan and a full description of the facility is contained in Section B of this RCRA permit application. A characterization of the hazardous wastes is contained in Section C. Copies of the Contingency Plan have been provided to the local emergency organization which Section B and C included in Appendices.

G-2 EMERGENCY COORDINATORS

If an emergency situation develops at the facility, the discoverer should contact an emergency coordinator listed in Table 3. John Sunderemyer, primary Emergency Coordinator, should be contacted first, and if he is not available, the others should be called (in the order listed) until someone is reached on the phone, one of the coordinators will be on 24-hour call can be reached by paging him by the following procedure:

SECTION H

PERSONNEL TRAINING

The information contained in this section outlines the personnel training program for Synpro's hazardous waste storage facility in accordance with the requirements of 40 CFR §§ 122.25 (a) (12) and §§ 264.16.

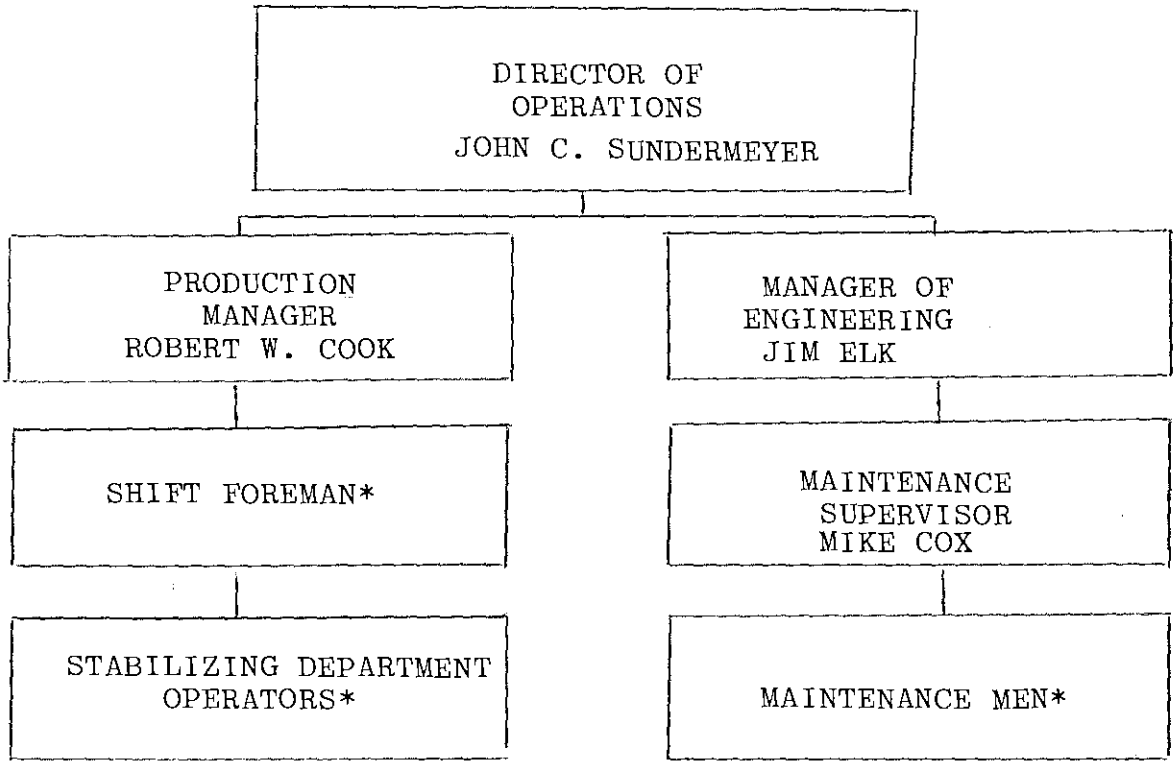
H-1 Outline of Training Program (40 CFR 122.25 (a) (12))

H-1a Job Titles and Duties

Figure 17 shows the organization of personnel at the facility. Only three employee categories are directly involved with the handling of waste: The shift foreman, maintenance men and the stabilizing department operators. Management responsibilities involving compliance with RCRA regulations but not involving actual handling of the wastes are split between the Director of Operations and the Manager of Engineering. Maintenance personnel (i.e., electricians and mechanics) work in the waste handling area, but they do not handle wastes directly. The duties, responsibilities, and qualifications of each position follow:

Position Title: Manager of Engineering

Position Responsibilities and Duties:



*Indicates those personnel directly involved with hazardous waste activities. Due to contract obligations with labor union names of these employees cannot be released, but are kept in a confidential file on site.

Figure 17. Organization chart for Synpro's HWM facility.

Experience and Qualifications

- o B.S. from a 4 year college in Chemical Engineering

Position Title: Director of Operations

Position Responsibilities and Duties:

- o Overall operation and maintenance of entire plant including hazardous waste storage area.
- o Makes decisions on solutions to hazards proposed by the Manager of Engineering.
- o Primary Emergency Coordinator

Experience and Qualifications:

- o Bachelor Degree from 4 year college in Chemical Engineering
- o 20 years experience
- o Registered Professional Engineer in Ohio, New Jersey and Colorado.

Position Title: Shift Foreman

Position Responsibilities and Duties:

- o Oversees operators and review their performance.
- o Trains operators to operate materials/drum handling equipment safely and handle leaks, spills, and emergency situations.
- o Maintains operating log, monitoring records, maintenance records, inspection records, personnel training records, and all other required records.
- o Notifies Director of Operations, Manager of Engineering, and if so directed, proper authorities in emergency situations.

- o Schedules for maintenance and repairs to structures and equipment for the plant.

- o Oversees mechanic/electrician doing both scheduled and unscheduled maintenance and repair work to be sure he is not releasing hazardous wastes to the environment or contaminating himself.

Experience and Qualifications:

- o High school diploma

- o 2-3 years experience in plant operation

- o Hazardous waste management experience helpful but not required.

  NOTE: If applicant has no hazardous waste experience, special training in the functions and operation of a hazardous waste storage facility will be required before assuming job responsibilities. This training will be provided by Synpro.

Position Title: Stabilizing Department Operators & Bulk Unloaders

Position Responsibilities:

- o Reports to shift foreman.

- o Operates waste handling equipment.

- o Inspects containers storage equipment, and any gauges, dials, and recorders as required for proper operation and structural integrity.

- o Inspects emergency equipment on a regular basis.

- o Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.

- o Makes appropriate entries into operating log, monitoring records, inspection records, and maintenance records, and files them according to established system.

- o Notifies foreman and other plant authorities as necessary in emergency situations.

- o Takes emergency action on own authority in accordance with established procedures.

security). A site diagram showing the dimensions, capacity, and relative position of each storage area (tanks, containers, and piles) is included.

Training for normal or routine operating conditions includes the following topics:

- Proper operation and maintenance of the storage facility.
- Scheduled inspections
- Purpose and use of security and communications systems
- Monitoring requirements for tracking and recording the operation of the facility
- Recordkeeping requirements and procedures

Section 3 - Emergency and Contingency Plans

The third section of the training manual provides detailed instruction on steps to be taken in the event of an emergency such as a waste spill or fire, power outage, or damage from wind and storms. The emergency coordinator, Mr. John Sundermeyer is clearly identified, as are emergency phone numbers and directions for locating and using onsite emergency equipment, alarms, and communications. Contingency plans are also detailed.

This manual is used in classroom training for both introductory training and annual review. All personnel involved with hazardous waste are required to complete classroom training in addition to on-the-job training. Also personnel receive a classroom review training session once a year. This is supplemented with attendance by the Director of Operations at seminars and conferences involving hazardous waste management.

H-1c Training Director

The personnel, training program is directed by J.C. Sundermeyer. Mr. Sundermeyer has a B.S. Degree in Chemical Engineering and is a registered Professional Engineer in Ohio.

H-1d Relevance of Training to Job Position

Pedco Environmental, Inc. of Cincinnati, Ohio was retained to prepare and teach hazardous waste management procedures including contingency plan implementation to all waste handling personnel. This teaching will be done under the direction of Mr. Sundermeyer, the Director of Operations. The training program is tiered (Figure 19) in some areas to provide training to personnel at levels that are relevant to their positions within the plant. For example, the shift foreman receives training in recordkeeping and other procedures required for compliance, whereas the operations do not. Operators are more specifically trained to maintain proper and safe operating procedures and to respond effectively in the event of a spill or other emergency. The more experienced operators are given a broader range in training than their assistant operators.

H-1e Training for Emergency Response

This training program is designed to ensure that personnel not only handle hazardous wastes in a safe manner but also properly respond to emergency situations. The program trains hazardous waste handling/management personnel to maintain compliance under both normal operating conditions and emergency conditions.

	Personal safety	Release prevention and response	Contingency plan	Emergency procedures	Hazardous waste management and practices	Record keeping	Hazardous waste handling and operations
Director of Operations	B	B	B	B	B	B	B
Manager of Engineering	B	B	B	B	B	B	B
Shift Foreman	B	B	B	B	B	B	B
Operators	B	B	B	B	L	L	B

B = broad instruction

L = limited instruction

Figure 19. Level of training for hazardous waste personnel.

SECTION I

CLOSURE PLAN, POST-CLOSURE PLAN, AND FINANCIAL REQUIREMENTS

This section is submitted in accordance with the requirements of 40 CFR §122.25 (a)(13), §264.112 through 115, and §264.178. This plan identifies all steps that will be necessary to completely close the facility at the end of its intended operating life. Partial closure is not planned and would be equivalent to final closure since there is only one hazardous waste storage area. A post-closure plan is not required because this is not a disposal facility and all wastes and residues will be removed at closure.

Synpro, a division of Plastics Specialties and Technology Corp., is located in Cleveland, Ohio. The company manufactures vinyl stabilizers and metallic stearates. Impure nonsalable products containing barium and cadmium are discarded and thus become hazardous wastes listed as D005 and D006, respectively. These wastes are generated before or after the filtering and drying operation in the manufacturing process. Approximately 50 percent of the hazardous wastes generated are in liquid form and the remainder are solid. Both forms are stored onsite in 55-gallon drums at the container storage building. The wastes are hauled to a permitted hazardous waste landfill or a deep well injection site by a contractor.

Implicit Price Deflator for Gross National Product* will be used to make this adjustment.

I-5 Financial Assurance Mechanism for Closure [40 CFR Sections 122.25(a)(1), 264.143, and 264.150]

Plastic Specialities and Technology established financial assurance for closure by establishing an irrevocable standby letter of credit. Included as Appendix 2, is a letter confirming this line of credit.

I-6 Post-Closure Cost Estimate [40 CFR Sections 122.25(a)(16) and 264.144

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

I-7 Financial Assurance Mechanism for Post-Closure [40 CFR Sections 122.25 (a)(16) and 264.145]

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

I-8 Liability Insurance [40 CFR Sections 122.25 (a)(17) and 264.147]

Plastic Specilities and Technology has been unable to obtain insurance through our insurance carrier. A letter confirming our attempts to obtain this insurance is included in the Appendex.

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*Published by U.S. Department of Commerce in its monthly publication, "Survey of Current Business."

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date: 10/17/85 Signature: John C. Sundermeyer

John C. Sundermeyer,
Director of Operations

Replace Appendix "2"

with the following page.

.E NUMBER I-33719

MARINE MIDLAND BANK, N.A.
140 BROADWAY, NEW YORK, N.Y. 10015

LETTER OF CREDIT

PLACE AND DATE OF ISSUE NEW YORK, 13 MAY 1985	DATE AND PLACE OF EXPIRY 1 MAY 1986 AT/IN NEW YORK
APPLICANT: PLASTIC SPECIALTIES & TECHNOLOGIES INC 119 CHERRY HILL ROAD PARSIPPANY NJ 07054	BENEFICIARY: DIRECTOR, OHIO STATE ENVIRONMENTAL PROTECTION AGENCY, SURVEILLANCE & ENFORCEMENT SECTION, DIV. OF HAZARDOUS WASTE MANAGEMENT *
ADVISING BANK: - -	AMOUNT: US$ 18,000.00 EIGHTEEN THOUSAND AND 00/100 U.S. DOLLARS

STATE OF OHIO EPA
361 EAST BROAD STREET
COLUMBUS OHIO 43216
ATTN MISS DEBRA L TEGTMEYER

DEAR SIR OR MADAM:

WE HEREBY ESTABLISH OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO. I33719 IN YOUR FAVOR, AT THE REQUEST AND FOR THE ACCOUNT OF PLASTIC SPECIALTIES &, TECHNOLOGIES INC, 119 CHERRY HILL ROAD, PARSIPPANY NJ 07054 UP TO THE AGGREGATE AMOUNT OF US$ 18,000.00, EIGHTEEN THOUSAND AND 00/100 U.S. DOLLARS AVAILABLE UPON PRESENTATION OF:

1. YOUR SIGHT DRAFT, BEARING REFERENCE TO THIS LETTER OF CREDIT NO. I33719, AND

2. YOUR SIGNED STATEMENT READING AS FOLLOWS: "I CERTIFY THAT THE AMOUNT OF THE DRAFT IS PAYABLE PURSUANT TO REGULATIONS ISSUED UNDER THE AUTHORITY OF CHAPTER 3734 OF THE OHIO REVISED CODE AS AMENDED."

[THIS LETTER OF CREDIT WILL BE AUTOMATICALLY EXTENDED FOR AN ADDITIONAL PERIOD OF ONE YEAR WITH A FINAL EXPIRY OF MAY 1, 1987.]

WHENEVER THIS LETTER OF CREDIT IS DRAWN ON UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS CREDIT, WE WILL DULY HONOR SUCH DRAFT UPON PRESENTATION TO US, AND WE WILL DEPOSIT THE AMOUNT OF THE DRAFT DIRECTLY INTO THE STANDBY TRUST FUND, ACCT #02-18-007110HIU77783603, OF PLASTIC SPECIALTIES & TECHNOLOGIES, INC. IN ACCORDANCE WITH YOUR INSTRUCTIONS.

OUR CUSTOMER CERTIFIES THAT THE WORDING OF THIS LETTER OF CREDIT IS IDENTICAL TO THE WORDING SPECIFIED IN PARAGRAPH (D) OF RULE 3745-55-51 OF THE OHIO ADMINISTRATIVE CODE AS SUCH REGULATIONS WERE CONSTITUTED.

WE HEREBY ENGAGE WITH YOU THAT ALL DRAFTS DRAWN UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS IRREVOCABLE LETTER OF CREDIT WILL BE DULY HONORED ON DELIVERY OF DOCUMENTS AS SPECIFIED IF PRESENTED AT OUR COUNTERS ON OR BEFORE THE EXPIRATION DATE INDICATED ABOVE.

THIS CREDIT IS SUBJECT TO UCP 400 EXCLUDING ARTICLE 45.

****

MARINE MIDLAND BANK, N.A.

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

Marsh & McLennan

Marsh & McLennan, Incorporated
163 Madison Avenue, CN-1966
Morristown, New Jersey 07960
Telephone 201 540-8600

July 22, 1985

Ms. Deborah L. Tegtmeyer
Surveillance & Enforcement Section
Division of Solid & Hazardous Waste Management
OHIO EPA
361 Broad St.
Columbus, OH 43216-1059

Richard K. Thoennessen
Vice President

Re: Plastic Specialties & Technologies, Inc.
Sudden Accidental Pollution Certification

Dear Debbie:

In compliance with rule 3745-55-51 (D) of the Ohio Administrative Code, we placed Sudden Accidental Pollution Liability coverage on behalf of our client, PS&T, Inc. and provided certification to the Ohio EPA for the period April 28, 1984 - 1985. In early February 1985, we were advised by the insurance carrier, The Travelers Insurance Company, that as of the anniversary date of the policy, April 28, 1985, the policy would contain an "absolute pollution exclusion". This development, excluding liability for all pollution and contamination claims was consistent with developments throughout our industry with respect to Pollution Liability coverage and had been anticipated by our marketing staff.

Concurrent with the notice which we received from The Travelers, we notified PS&T senior management of the problem and took the following actions:

1. Requested that Travelers reconsider its decision to categorically exclude all pollution coverage, and at the very least, consider providing coverage on a "claims made" policy form as opposed to the standard "occurrence form";

2. Submitted applications to the following insurance companies:

   Hartford Indemnity
   American Home
   Zurich American
   Wausau
   Pacific Star
   American International Group

3. Requested that The Great American Insurance Company, the insurance carrier providing the "gradual pollution" liability insurance, consider amending its coverage to include "Sudden Accidental Pollution" liability coverage.

4. Submitted an application to Stewart Smith, underwriting manager, as well as American Home Insurance Company for pollution liability coverage.

Although you are well aware of the collapse of the pollution liability insurance markets, I have taken the liberty of enclosing recent articles regarding the state of the pollution liability marketplace. Bhopal, recent judicial decisions, mounting pollution liability claims, and the withdrawal of many reinsurers from the pollution liability markets underscore the lack of success we have experienced on all fronts in attempting to place the Sudden Accidental pollution liability coverage. The results of our efforts to date are listed below:

1. Travelers provided a quotation for the new form of pollution liability coverage for "Unintentional and Unexpected" claims made during the policy period. However, the Wayside Ave., Cleveland location was specifically excluded from coverage and the new form did not provide for "Sudden Accidental" pollution liability.

2. The Hartford, Zurich American, Wausau and Pacific Star all declined to quote the risk. American Home and Stewart Smith quoted "gradual pollution" only without "Sudden Accidental" protection.

3. The Great American Insurance Company was unable to extend its "gradual pollution" liability policy currently in force for PS&T, from October 19, 1984 - 1985, policy no. 4 CM 0 29 66 to include any form of "Sudden Accidental" pollution liability coverage.

We feel that our marketing has been thorough and request your understanding during these difficult times. Please feel free to contact me should you require any additional information or assistance.

Sincerely,

Richard K. Thoennessen

cc: T. Brennan
C. Fletcher

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: SYNPRO Division of Dart Industries, Inc.

Facility Location: 1636 Wayside Road, Cleveland, Ohio 44112

EPA Identification Number: OHD 077-783-603

Effective Date: 30 days after service of notice of decision requested under 40 CFR 124.19.

Expiration Date: Ten (10) years after the effective date

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC., §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) codified and to be codified in Title 40 of the Code of Federal Regulations, a permit is issued to SYNPRO Division of Dart Industries, Inc. (hereafter called the Permittee) to operate a hazardous waste storage facility located in Cleveland, Ohio, at latitude 41'degrees 33'19" and longitude 81 degrees 33'37". You are authorized to conduct the following hazardous waste management activities:

X Storage	___ Treatment	___ Disposal
X Container	___ Tank	___ Injection Well
___ Tank	___ Surface Impoundment	___ Landfill
___ Waste Pile	___ Incinerator	___ Land Application
___ Surface Impoundment	___ Other (Detonation)	___ Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

X 261	X 264, Subpart G	___ 264, Subpart K
X 262	X 264, Subpart H	___ 264, Subpart L
X 264,	X 264, Subpart I	___ 264, Subpart O
X 264, Subpart A-E	___ 264, Subpart J	X 270

Permit Approval:

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the final permit application, as amended, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. An inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's abillity to comply with the applicable regulations or permit conditions.

Issued this 25th day of April, 1984

by Basil G. Constantelos
Basil G. Constantelos, Director
Waste Management Division

PERMIT INDEX

	Page
Permit Index	i

Attachments

I. Permit Conditions

Standard Conditions	1
General Facility Conditions	7
Storage in Containers	11

II. Waste Analysis Plan

III. Inspection Plan

IV. Personnel Training Plan

V. Contingency Plan

VI. Closure Plan

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT I
PERMIT CONDITIONS

SYNPRO Div. of Dart Industries
U.S. EPA FACILITY ID #: OHD-077-783-603

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606(a), commonly known as (CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application, or other appropriate action.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. The duration of this permit shall be ten years from the effective date of the permit, in conformance with the provisions of 40 CFR §270.50. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.16) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 June 1982; Standard Methods for the Examination of Water and Wastewater, 1980; or an equivalent method as specified in the attached Waste Analysis Plan, Attachment II.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(iv) The individual (s) Who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittee may not commence storage of hazardous waste at modified or newly constructed storage areas at the facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the storage area(s) has (have) been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed storage area (s) and finds it (them) is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has no within 15 days notified the Permittee of his or her intent to inspect.

12. Anticipated Noncompliance . The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility ot activity which may result in noncompliance with permit requirements.

13. Transfer of Permits. The permit may be transferred to a new owner or operator only if it is modified or revoked and reissued to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition I.D.14.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

18. Submittal of Written Reports. All written reports required to be submitted by the Permittee pursuant to this permit shall be sent to: U.S. EPA, Region V, Waste Management Division, Attn: Technical, Permits, and Compliance Section, 230 South Dearborn Street, Chicago, Illinois 60604.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. Documents To be Submitted Prior to Operation.
None.

H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

(1) Waste analysis plan as required by 40 CFR 264.13 and this permit.

(2) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

(3) Contingency plan as required by 40 CFR 264.53(a) and this permit.

(4) Closure plan as required by 40 CFR 264.112(a) and this permit.

(5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

(6) Operating record as required by 40 CFR 264.73 and this permit.

(7) Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.

II. GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. Required Notice. The Permittee receives no waste from off-site; therefore, notices of the imports of hazardous waste will not be necessary.

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment II.

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment III. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.I5(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment IV. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17 (a).

H. Location Standards. The facility is not located in a floodplain as described in 40 CFR 270.14.

I. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment V as required by 40 CFR 264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency, and shall follow the Inspection Plan, shown in Attachment III.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment V, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.

3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.

4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment VI.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment VI. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment VI.

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment VI.

6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan, Attachment VI, and as required by 40 CFR 264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment VI.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

R. Financial Assurance and Documentation Requirements.

Where the requirements of 40 CFR §264.143 and §264.147 are met through the use of state-required mechanisms pursuant to §264.149, documentation shall be made out to the Director of the Ohio Environmental Protection Agency. Copies shall be submitted to U.S. EPA, Region V office.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store up to a total of 4,400 gallons of wastes in containers at the facility, subject to the terms of this permit:

Waste Type	Waste Code
a. Barium-containing wastes (solid or liquid)	D005
b. Cadium-containing wastes (solid or liquid)	D006

The Permittee may store these wastes in 55-gallon capacity drums with the total quantity of drums stored not to exceed 80 drums.

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired, as required by 40 CFR 264.172.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175. (The containment system is contained in a 30' x 30' building separated from the manufacturing plant, and the system is a sump on each side of the door which can be pumped if necessary. The building contains no floor drains).

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall store no ignitable or reactive waste.

G. Special Requirements for Incompatible Waste.

1. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

   (None of the wastes that the Permittee stores are incompatible.)

2. The Permittee must document compliance with III.G.1 as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II.L.1).

JUL 20 1983

Permittee:

SYNPRO Division of
Dart Industries, Inc.
1636 Wayside Road
Cleveland, Ohio 44112

I.D. Number OHD 077-783-603
Permit Number

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to SNYPRO Division of Dart Industries, Inc. (hereafter called the Permittee), to operate a hazardous waste storage facility located in Cleveland, Ohio, on 1636 Wayside Road, at latitude 41° 33'019" and longtitude 81° 33'037".

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264, 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated December 1, 1982, as modified by a subsequent amendment dated May 20, 1983, (hereafter referred to as the application) is accurate and that the facility will be operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (See 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of
, and shall remain in effect until
, unless revoked and reissued, or terminated (40 CFR §270.41 and .43) or continued in accordance with §270.51.

090-15

Public Review Copy

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.29) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 Government Printing Office 1980, Standard Methods of Wastewater Analysis or an equivalent method as specified in the attached Waste Analysis Plan.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittee may not commence any new construction for the hazardous waste at the facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition I.D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. Documents To Be Submitted Prior to Operation.

None.

H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

(1) Waste analysis plan as required by 40 CFR 264.13 and this permit.

(2) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

(3) Contingency plan as required by 40 CFR 264.53(a) and this permit.

(4) Closure plan as required by 40 CFR 264.112(a) and this permit.

(5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

(6) Operating record as required by 40 CFR 264.73 and this permit.

(7) Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.

II. GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. Required Notice.

(1) The Permittee receives no waste from off-site; therefore, notices of the import of hazardous waste will not be necessary.

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment (1).

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b).

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment (2). The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment (3). The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).

H. Location Standards.
The facility is not located in a floodplain as described in 40 CFR 270.14.

I. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment (4) as required by 40 CFR 264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment (4), and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.

3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.

4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment (5).

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment (5).

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment (5).

6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment V.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

III. TORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

D005/D006 Barium and Cadium bearing wastes either in solvent or particulate form, stored in 55 gallon drums in accordance with the U.S. Department of Transportation (DOT) number 17C; maximum amount of waste stored will be 80 drums.

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172. The containers are stainless steel lined with epoxy which renders the surface inert.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175.

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall store no ignitable or reactive waste.

G. Special Requirements for Incompatible Waste.

1. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR 264.17(b).

2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

3. The Permittee shall separate containers of incompatible wastes as indicated in the attached plans.

   None of the wastes that the Permittee stores are incompatible.

4. The Permittee must document compliance with III. G. (1) and (2) as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II. L.1).

WASTE ANALYSIS PLAN

Parameter/characteristic	Value
Physical state	Solid at 70°F
Percent solids	95%
Specific weight	110 lb/ft^3
Flash point	221°F
Organic components	
Alkyl-aryl phosphites	0-15%
Hydrocarbon solvents	0-15%
Metal components	
Barium	1.8%
Cadmium	0.5%
Zinc	1.0%
Inorganic components	
Diatomateous earth	0-50%

The vinyl plastic stabilizer scrap is generated from the same process as the filter press and floor sweeping waste, which is the reaction of organic acids and metallic bases in organic solvents. This waste is hazardous due to its EP toxicity for barium and cadmium and has the EPA hazardous waste numbers D005 and D006. The chemical/physical characteristics of this waste are as follows:

Parameter/characteristic	Value
Physical state	Liquid at 70°F
Phases	Bilayered
Percent total solid	1%
Percent dissolved solids	35%
Specific weight	8.04 lb/gal
Flash point	225°F
Ash content	8.6%
Organic components	
Alkyl-aryl phosphites	0-30%
Hydrocarbon solvents	0-30%
Metal components	
Barium	0.47%
Cadmium	0.9%
Zinc	1.7%

(continued)

(continued)

Parameter/characteristic	Value
Inorganic components	
Diatomaceous earth	0-0.1%

The hazards associated with this waste is its toxicity. It contains barium and cadmium at levels that exceed the maximum allowable limits for EP toxicity.

C-2 WASTE ANALYSIS PLAN [40 CFR 122.25(a)(3) and 264.13(b) and (c)]

The hazardous waste regulations promulgated under RCRA by the U.S. Environmental Protection Agency require that the owner/operator of a hazardous waste treatment storage, and disposal facility (TDSF) develop and follow a written waste analysis plan. This waste analysis plan describes the procedures which are used to obtain detailed chemical and physical analysis of a representative sample of waste. The analysis is repeated as necessary to ensure that it is accurate and up to date, and includes all information needed to properly treat, store, or dispose of the waste.

C-2a Parameters and Rationale

Table 1 of this waste analysis plan presents the analytical parameters for the two hazardous waste generated at Synpro. Some of this data can be obtained from visual inspection and knowledge of the waste generating process. Also included in Table 1 is the rationale for selecting these analytical parameters.

TABLE 1

ANALYTICAL PARAMETERS AND RATIONALE FOR THEIR SELECTION

Parameter	Rationale
Specific weight	This information is needed to properly handle and ship waste.
Flash point	If the waste has a low flash point, extra precautions will be taken to handle and store and especially to isolate from sources of ignition.
Color	Color is a visual means of determining waste consistency.
Ash content	This information is required by disposal facility.
Distinctive odor	Odor is a means of determining waste consistency.
Organic components	This information is required by disposal facility.
Heavy metals	Both wastes contain barium and cadmium which are toxic at certain concentration levels.
Inorganic compounds	This information is required by disposal facility.

C-2b Sampling Methods

Acquisition of a representative sample of hazardous waste for subsequent chemical analysis is accomplished by preparing a composite of several subsamples of the waste. To ensure that the bulk of the waste is accurately represented by the composite sample, the sampling strategy includes collection of a minimum of three subsamples which provide integration of both the depth and the surface area of the waste as contained in the drums.

The sampling methods used for sampling each type of waste material generated at Synpro are described below.

FITLER PRESS AND FLOOR SWEEPING WASTE

The filter press and floor sweeping wastes are sampled using a thief sampler. A thief sampler consists of two slotted concentric tubes made of stainless steel or brass. The outer tube has a conical pointed tip which permits the sampler to penetrate the material being sampled (see Figure 4). The inner tube is rotated to open and close the sampler. The thief is inserted closed into the waste material. The inner tube is rotated to open the thief and wiggled to encourage material to flow into the thief. It is then closed and withdrawn. The sampler thief is placed in a horizontal position with the slots facing upward and inner tube removed from the thief to transfer sample to a container.

VINYL PLASTIC STABILIZER SCRAP

The vinyl plastic stabilizer scrap is sampled using a dipper. The dipper consists of a glass or plastic beaker

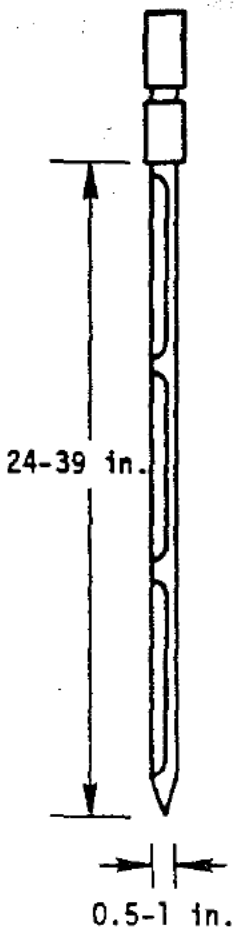


Figure 4. Thief sampler.

clamped to the end of a 2- or 3-piece pole which serves as the handle (See Figure 5.) The beaker, clamp, and handle are cleaned and assembled by bolting adjustable clamp to the pole. The beaker is placed in the clamp and fastened shut. The dipper is turned so the mouth of the beaker faces down and inserted into waste material. The beakers is turned right side up when dipper is at desired depth. The beaker is allowed to fill completely as shown by the cessation of air bubbles. The dipper is raised and sample transferred to a container.

C-1c Frequency of Analysis

The processes generating the waste are stable and therefore wastes do not vary significantly in composition. Each drum or container is sampled prior to disposal. This frequency of analysis is sufficient to ensure that analytical data is up-to-date. More frequent analysis is initiated if a change in the waste composition is suspected.

C-2d Analysis Methods

The analysis methods used for the hazardous waste generated and stored at Sympro are described in the following pages.

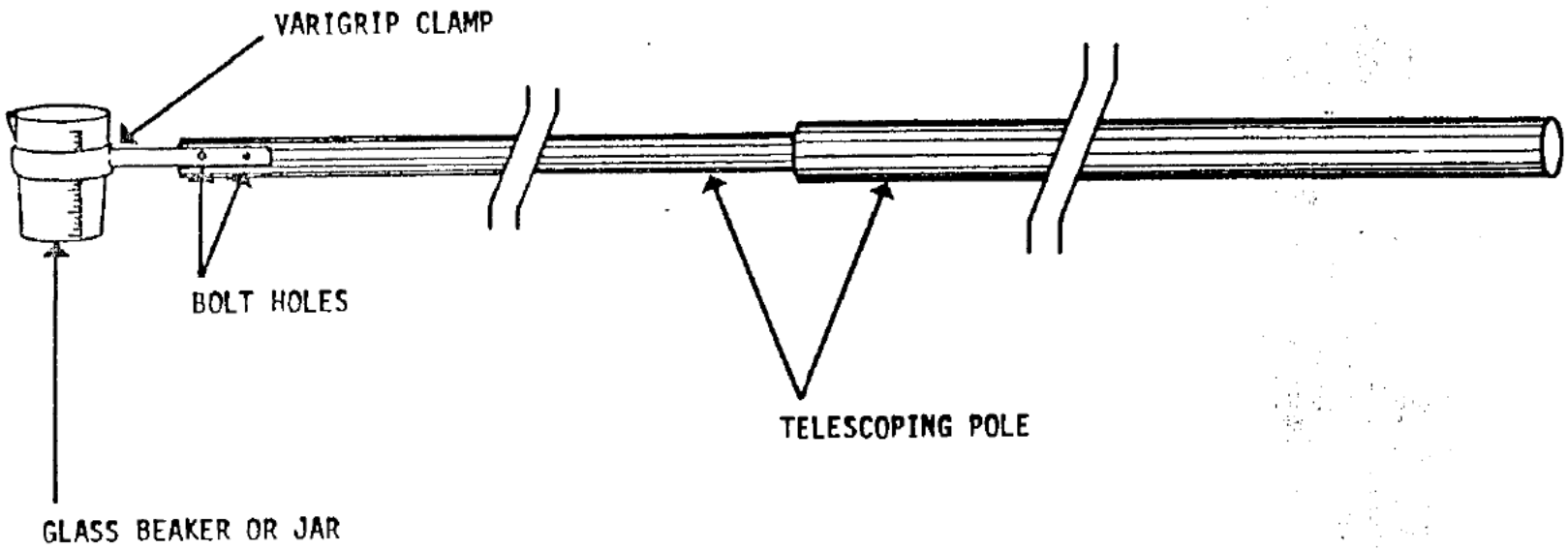


Figure 5. Dipper sampler.

ANALYSIS METHOD -SPECIFIC GRAVITY

This method is applicable to the determination of specific gravity on all currently produced powders and liquids. For liquids, the weight per gallon cup is filled according to directions and the sample is then weighed. The weight of the sample multiplied by the cup factor is specific gravity. For solid materials, the weight per gallon cup is used and specific gravity is determined by displacement.

APPARATUS

1. Regular weight per gallon cup.

2. Torsion Balance, or equivalent, capable of weighing to nearest 0.01 gram.

PROCEDURE

1. The weight per gallon cup, with its cover, is tared on the balance. The cup is removed from the balance and the liquid to be measureD is poured into the cup. The cover is placed on top and gently forced down to the extent of its travel. The excess material is removed from the cover and sides of the cup. The cup is then weighed to the nearest 0.01 gram. The weight in grams of the contents, divided by 10, is the weight per gallon. The weight of the contents, multiplied by 0.012, is the specific gravity.

2. The weight per gallon cup, with its cover, is tared on the balance. Solid material, ca. 5 grams, is placed in the cup and the net weight in grams (Ws) is determined. The cup is then filled with a liquid of known specific gravity (Note 1) and the total net weight in grams (Wt) is determined. The specific gravity of the solid is equal to the weight of the solid times the specific gravity of the liquid all divided by 83.2 times the specific gravity of the liquid plus the weight of the solid minus the total weight.

CALCULATIONS

For liquids:

$$\text{Weight per gallon} = \frac{\text{Net weight of liquid in grams}}{10}$$

Specific gravity = Net weight of liquid in grams x 0.012

For solids:

$$S_s = \frac{W_s \times S_i}{(83.2\ S_i) + W_s - W_t}$$

where: S_s = Specific gravity of solid
W_s = Weight of solid
S_i = Specific gravity of liquid
W_t = Total weight

Report results to the nearest 0.001 units.

NOTE 1:

The liquid used must be capable of wetting the solid material. In the case of metallic soaps, ethyl alcohol is satisfactory. Determine the specific gravity fo the liquid in accordance with Procedure 1.

ANALYSIS METHOD -VISCOSITY AND COLOR

This method is applicable to all currently produced liquid materials having viscosities less than Z-6 and colors less than 18. The liquid sample is poured into a varnish tube and the viscosity is compared to reference standards. The viscosity is recorded as a letter. The tube is then placed in a color comparator and the color is recorded as a numeral.

APPARATUS

1. Varnish Comparator, Gardner, Hellige. Available from Gardner Laboratories, Inc., Bethesda, Maryland 20014.

2. Viscometer, Bubble, Varnish Series, A to T and U to Z-6, Gardner. Available from Gardner Laboratories, Inc.

3. Varnish Tubes, Grade B, with corks. Available from Gardner Laboratories, Inc.

PROCEDURE

Viscosity

The varnish tube is filled to the mark with the liquid to be checked and the cork stopper is inserted. An appropriate viscosity tube is inverted with the sample tube and the rate of rise of the bubble is compared. This procedure is continued until a match or near-match is obtained. The viscosity is then recorded as less than, equal to, or greater than the standard tube.

Color

The viscosity tube is placed in the varnish comparator and the color wheel is rotated until a match or near-match in color is obtained. The color is then recorded as less than, equal to, or greater than the appropriate standard color.

REPORTING RESULTS

Report results as being less than, equal to, or greater than the appropriate viscosity or color standards.

ANALYTICAL METHOD - TOTAL ASH, WASHED ASH, WATER SOLUBLE ASH

This method is applicable to the determination of ash or residue on ignition of all currently produced powders, except those containing cadmium. A sample is charred as completely as possible over a Fisher burner and the residue is then ignited to constant weight in a muffle furnace. The residue weight times 100 divided by the original sample weight is total ash. The sample and crucible is then placed in a 250 ml. beaker and covered with distilled water. The difference between total ash and washed ash is water soluble ash.

APPARATUS

1. Analytical balance with Class S weights.
2. Procelain crucibles, Coors #1, #1A, and #3.
3. Fisher burner, with support stand and nichrome triangle.
4. Muffle furnace, electric, Hoskins Model FD 202 or equivalent.
5. Beaker, Griffin, low form, 250 ml capacity.
6. Filter paper, Whatman #41 or equivalent.

PROCEDURE

1. Weigh to the nearest 0.1 milligram, 2-3 grams of sample into a tared crucible, Coors #1 or #1A. Place the sample and crucible in a Coors #3 crucible which is supported over a Fisher burner by means of a metal ring and nichrome triangle. Apply heat and ash the sample as completely as possible without causing the sample to flame. When the sample is charred, remove the crucible and residue and place it in the electric muffle furnace maintained at 1000 $\pm$50°C and ignite to constant weight. Cool in a desiccator and weigh. The residue is total ash. If washed ash or water-soluble ash is desired, retain the total ash residue and proceed under 2, below.
2. Place the crucible from the total ash determination into a 250 ml beaker. Cover the crucible and contents with distilled water and boil for 5 minutes. Cool and filter through a Whatman #41 paper and wash. Place the filter paper and its contents into the original tared crucible. Char off the paper and ignite again in the muffle furnace to a constant weight. Cool in a desiccator and reweigh. The residue is washed ash.

CALCULATIONS

$$\% \text{ Total ash} = \frac{\text{Weight of ash} \times 100}{\text{Sample weight}}$$

$$\% \text{ Washed ash} = \frac{\text{Weight of washed Ash} \times 100}{\text{Sample weight}}$$

% Water soluble ash = % total ash - % washed ash

Report results to the nearest 0.01%.

ANALYTICAL METHOD - ATOMIC ABSORPTION ANALYSIS

This method is applicable to all powder or liquid stabilizers. This method does not apply to the determination of trace metals. A weighed sample is digested with HCl and the concentration of the metal chlorides in solution is determined by atomic absorption.

APPARATUS AND REAGENTS

1. Beaker, Griffin, low form, 150 ml.
2. Analytical balance.
3. Hydrochloric acid, reagent, concentrated.
4. Volumetric flasks, 100 ml, Class A.
5. Beeswax
6. Filter paper, Whatman No. 41 or equivalent.
7. Atomic Absorption Spectrophotometer, Model 603.
8. Acetylene
9. Nitrous oxide
10. Four-inch single-slot burner head.
11. Nitrous oxide burner head.
12. Hollow cathode lamps.

PROCEDURE

Weigh to the nearest 0.1 mg., one gram of sample into a tared 150 ml beaker. Add 20 mls concentrated HCl and a few boiling chips. Place the beaker on a hot plate and cover it with a small watch glass to prevent loss of sample during boiling. If the sample is a solid, boil the solution until the fatty acid separates as a clear layer on the surface of the

liquid. If the sample is a liquid, boil it for 10 minutes. In either case, after the digestion of the sample is complete, add 40 mls of distilled water to the beaker and boil for an additional 10 minutes. After this, the beakers that contained the solid samples are removed from the hot plate and allowed to cool. The beakers containing liquid samples are taken off the hot plate and about one gram of beeswax is then added. The beakers are returned to the hot plate and boiled until the beeswax melts. The beakers are then removed from the hot plate and allowed to cool. The solid layer is lifted above the beaker and rinsed with a fine stream of distilled water. Care should be taken that all the rinse water goes into the beaker. After the solid layer has been rinsed, it may be discarded. Filter the solution through Whatman No. 41 filter paper into a 100 ml volumetric flask. Rinse the filter paper with small aliquots of distilled water and then discard the paper. Dilute to the mark with distilled water. Use the following steps for atomic absorption analysis for the determination of each element under consideration.

1. Follow manufacturer's operating instructions for all instrument settings and operations.

2. Prepare the sample dilutions and the standards by following the appropriate method depending on what metal is to be determined and concentration.

3. Run a series of standards and construct a calibration curve by plotting the concentrations of the standards against the absorbances.

4. Analyze, by the method of standard additions, samples, duplicates, spiked samples, and check standards.

CALCULATIONS

Calculate metal concentrations by the method of standard additions, or from a calbiration curve. All dilution or concentration factors must be taken into account. Concentrations reported for multi-phased or wet samples are appropriately qualified (e.g., 5 µg/g dry weight).

F-2 Inspection Schedule

F-2a General Inspection Requirements

Synpro conducts regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous waste constituents and adversely affect the environment or threaten human health.

F-2a(1) Types of Problems

Table 2 presents a schedule for inspecting the container storage area, safety and emergency equipment, and security devices. The items listed in the table are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards. Provided with each item is a list of problems normally encountered.

F-2a(2) Frequency of Inspection

Also provided in Table 2 is a recommended frequency of inspection for each item.

F-2b Specific Process Inspection Requirements

F-2b(1) Container Inspection

Inspections of the container storage area will be conducted per the inspection schedule provided in Table 2. Results of each inspection will be recorded on inspection log sheets entitled, "Container Storage Area Inspection Log Sheet", "Safety and Emergency Equipment Inspection Log Sheet", and "Security Devices Inspection Log Sheet". The log sheets may be found in Figures 8, 9, and 10, respectively. Information requested on the log sheets includes the inspector's name and title, date and time

TABLE 2. INSPECTION SCHEDULE

Area/equipment	Specific item	Types of problems	Frequency of inspection
Container storage area	Container placement and stacking	Aisle space, height of stacks	Weekly
	Sealing of containers	Open lids	Weekly
	Labeling of containers	Improper identificiation, date missing	Weekly
	Containers	Corrosion, leakage, structural defects	Weekly
	Pallets	Damaged (e.g., broken wood, warping, missing)	Weekly
	Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Curb	Cracks, deterioration	Weekly
	Sump areas	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Debris and refuse	Clog sump pump, aesthetics, possible reaction with leaks	Weekly
	Ramps	Cracks, spalling, uneven settlement, erosion	Weekly
	Warning signs	Damaged	Weekly
Safety and emergency equipment	Standard industrial absorbents	Out of stock	Monthly/as needed
	Absorbent pads	Out of stock	Monthly/as needed
	55-gallon drums (steel, stainless steel)	Corrosion, structural damage	Monthly
	Extra protective eyeglasses	Broken or dirty equipment	Monthly
	Disposable respirators	Out of stock	Monthly/as needed
	Portable sump pump	Power, clogging	Monthly
	Fire blankets	Dispensing	As used
	Fire extinguishers	Need recharging	Monthly/after each use
	Fire alarm system	Power failure	Per NEPA
	Telephone system	Power failure	Per NEPA

(continued)

TABLE 2 (continued)

Area/equipment	Specific item	Types of problems	Frequency of inspection
Safety and emergency equipment (continued)	Public address (PA) system	Power failure, speakers	Per NEPA
	Emergency lighting system	Battery failure, lights	Per NEPA
	First aid equipment and supplies	Items out of stock or inoperative	As used
	Protective clothing (impermeable full body coveralls, gloves, and foot coverings)	Holes, normal wear and tear	As used
Security devices	Facility fence	Corrosion, damage to chain-link fence or barbed wire	Weekly
	Main, rear, and side gates and locks	Corrosion, damage to chain-link fence or barbed wire; sticking or corroding lock	Weekly
	Container storage building	Corrosion	Weekly
	Container storage building lock	Corrosion, damage sticking or corroding lock	Weekly

CONTAINER STORAGE AREA INSPECTION LOG SHEET

Inspector's name/title _____

Date of inspection _____ (month/day/year)

Time of inspection _____ (military time)

Item	Type of problems	Status (√)		Observations	Date and nature of repairs/remedial action
		Acceptable	Unacceptable		
Container placement and stacking	Aisle space, height of stacks				
Sealing of containers	Open lids				
Labeling of containers	Improper identification, date missing				
Containers	Corrosion, leakage, structural defects				
Pallets	Damaged (e.g., broken wood, warping, nails (missing)				
Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots				
Curb	Cracks, deterioration				
Sump area	Cracks, spalling, uneven settlement erosion, wet spots				
Debris and refuse	Clog sump pump, aesthetics, possible reaction with leaks				
Ramps	Cracks, spalling, uneven settlement, erosion				
Warning signs	Damaged				

Figure 8. Container storage area inspection log sheet.

SAFETY AND EMERGENCY EQUIPMENT INSPECTION LOG SHEET

Inspector's name/title _____ / _____

Date of inspection _____ (month/day/year)

Time of inspection _____ (time)

Item	Type of problems	Status (√)		Observations	Date and nature of repairs/remedial action
		Acceptable	Unacceptable		
Standard industrial absorbents	Out of stock				
Absorbent boom	Out of stock				
55-gallon drums (steel, stainless steel)	Corrosion, structural damage				
Extra protection eyeglasses	Broken or dirty equipment				
Disposable respirators	Out of stock				
Portable sump pump	Power, clogging				
Fire blankets	Dispensing				
Fire extinguishers	Needs recharging				
Fire alarm system	Power failure				
Telephone system	Power failure				
Public address system	Battery failure, lights				
Emergency lighting system	Battery failure, lights				
First aid equipment and supplies	Items out of stock or inoperative				
Protective clothing (impermeable full-body coveralls, gloves, and foot coverings)	Holes, normal wear and tear				

Figure 9. Safety and emergency equipment inspection log sheet.

SECURITY DEVICES INSPECTION LOG SHEET

Inspector's name/title _____/_____

Date of inspection _____ (month/day/year)

Time of inspection _____ (military time)

Item	Type of problems	Status (✓)		Observations	Date and nature of repairs/remedial action
		Acceptable	Unacceptable		
Facility fence	Corrosion, damage to chain link fence or barbed wire				
Main, rear and side gates and locks	Corrosion, damage to chain link fence or barbed wire; sticking or corroding lock				
Container storage building	Corrosion, damage to building				
Container storage building door and lock	Corrosion, damage to door sticking or corroding lock				

Figure 10. Security devices inspection log sheet.

of inspection, item of inspection, typical problems encountered, status of the item, observations, and the date and nature of repairs and remedial action. Typical problems encountered with each item of inspection, included in the inspection schedule, are provided on the log sheet to serve as a reminder to the inspector and to ensure a complete inspection. The inspector is required to check the status of each item and indicate whether its condition is acceptable or unacceptable. Regardless of the status, observations are made as to the number of containers, aisle space, height of container stacking, inventory quantities, observation of leakage, and more. If the status of a particular item is unacceptable, appropriate and complete information is recorded, including date and nature of repairs and remedial action.

F-2c Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately. Synpro personnel will notify the appropriate authorities per the Contingency Plan (see Section G) and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the Contingency Plan for further details.

F-2d Inspection Log

An inspection log is maintained for each calendar year in a three-ring binder that is subdivided by sections for each area/equipment. After an inspection, each log sheet is filed in the binder according to area/equipment, which provides a case history of a particular item. The inspection log notebook is always kept with the inspection schedule in the Plant Manager's office. As required, records of inspections are kept for at least 3 years from the date of inspection.

F-3 Waiver of Preparedness and Prevention Requirements

The applicant does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR §264 Subpart C. Requirements of this Subpart are primarily addressed in Sections D, F, and G of this application.

F-3a Equipment Requirements

Internal and external communications, emergency equipment, and fire control equipment are discussed in Sections F and G.

F-3b Aisle Space Requirements

Aisle space requirements are addressed in Sections D-1a(2), F-5c, and G.

F-4 Preventive Procedures, Structures, and Equipment

F-4a Loading/Unloading Operations

Loading operations at the facility, other than removal operations at the container storage area, take place in the processing area. Wastes generated in the processing area are collected in hoppers and loaded into drums for transport to the container

ATTACHMENT (3)

SECTION H

PERSONNEL TRAINING

The information contained in this section outlines the personnel training program for Synpro's hazardous waste storage facility in accordance with the requirements of 40 CFR §122.25(a)(12) and §264.16.

H-1 Outline of Training Program [40 CFR 122.25(a)(12)]

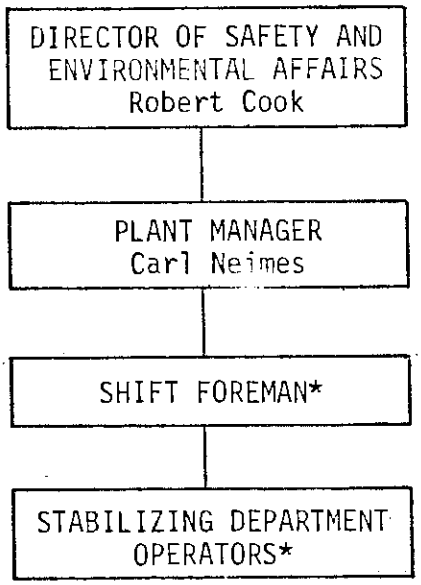
H-1a Job Titles and Duties

Figure 17 shows the organization of personnel at the facility. Only two employee categories are directly involved with the handling of waste: the shift foreman, and the stabilizing department operators. Management responsibilities involving compliance with RCRA regulations but not involving actual handling of the wastes are split between the Plant Manager and Director of Safety and Environmental Affairs. Maintenance personnel (i.e., electricians and mechanics) work in the waste handling area, but they do not handle wastes directly. The duties, responsibilities, and qualifications of each position follow:

Position Title: Director of Safety and Environmental Affairs

Position Responsibilities and Duties:

- Maintains facility compliance with environmental regulations and permits including RCRA.



* Indicates those personnel directly involved with hazardous waste activities. Due to contract obligations with labor union names of these employees cannot be released, but are kept in a confidential file on site.

Figure 17. Organization chart for Synpro's HWM facility.

- Responsible for informing Plant Manager of potential safety and environmental hazards and proposing specific solutions.

- In charge of personnel training porgram. As Training Director is responsible for preparing and teaching training course on safety and proper handling and management of hazardous waste and materials.

Experience and Qualifications:

- B.S. from a 4 year college

- 5 years experience in environmental affairs

Position Title: Plant Manager

Position Responsibilities and Duties:

- Overall operation and maintenance of entire plant including hazardous waste storage area.

- Makes decisions on solutions to hazards proposed by Safety and Environmental Affairs Director.

- Primary Emergency Coordinator

Experience and Qualifications:

- B.S. from 4 year college in Chemistry or Chemical Engineering

- 5 years experience

Position Title: Shift Foreman

Position Responsibilities and Duties:

- Oversees operators and reviews their performance.

- Trains operators to operate materials/drum handling equipment safely and handle leaks, spills, and emergency situations

- Maintains operating log, monitoring records, maintenance records, inspection records, personnel training records, and all other required records.

- Notifies plant manager, Director of Safety and Environmental Affairs, and if so directed, proper authorities in emergency situations.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT II
WASTE ANALYSIS PLAN

SYNPRO Div. of Dart Industries
U.S. EPA Facility ID #: OHD-077-783-603

WASTE ANALYSIS PLAN

Parameter/characteristic	Value
Physical state	Solid at 70°F
Percent solids	95%
Specific weight	110 lb/ft^3
Flash point	221°F
Organic components	
Alkyl-aryl phosphites	0-15%
Hydrocarbon solvents	0-15%
Metal components	
Barium	1.8%
Cadmium	0.5%
Zinc	1.0%
Inorganic components	
Diatomateous earth	0-50%

The vinyl plastic stabilizer scrap is generated from the same process as the filter press and floor sweeping waste, which is the reaction of organic acids and metallic bases in organic solvents. This waste is hazardous due to its EP toxicity for barium and cadmium and has the EPA hazardous waste numbers D005 and D006. The chemical/physical characteristics of this waste are as follows:

Parameter/characteristic	Value
Physical state	Liquid at 70°F
Phases	Bilayered
Percent total solid	1%
Percent dissolved solids	35%
Specific weight	8.04 lb/gal
Flash point	225°F
Ash content	8.6%
Organic components	
Alkyl-aryl phosphites	0-30%
Hydrocarbon solvents	0-30%
Metal components	
Barium	0.47%
Cadmium	0.9%
Zinc	1.7%

(continued)

(continued)

Parameter/characteristic	Value
Inorganic components	
Diatomaceous earth	0-0.1%

The hazards associated with this waste is its toxicity. It contains barium and cadmium at levels that exceed the maximum allowable limits for EP toxicity.

C-2 WASTE ANALYSIS PLAN [40 CFR 122.25(a)(3) and 264.13(b) and (c)]

The hazardous waste regulations promulgated under RCRA by the U.S. Environmental Protection Agency require that the owner/operator of a hazardous waste treatment storage, and disposal facility (TDSF) develop and follow a written waste analysis plan. This waste analysis plan describes the procedures which are used to obtain detailed chemical and physical analysis of a representative sample of waste. The analysis is repeated as necessary to ensure that it is accurate and up to date, and includes all information needed to properly treat, store, or dispose of the waste.

C-2a Parameters and Rationale

Table 1 of this waste analysis plan presents the analytical parameters for the two hazardous waste generated at Synpro. Some of this data can be obtained from visual inspection and knowledge of the waste generating process. Also included in Table 1 is the rationale for selecting these analytical parameters.

TABLE 1

ANALYTICAL PARAMETERS AND RATIONALE FOR THEIR SELECTION

Parameter	Rationale
Specific weight	This information is needed to properly handle and ship waste.
Flash point	If the waste has a low flash point, extra precautions will be taken to handle and store and especially to isolate from sources of ignition.
Color	Color is a visual means of determining waste consistency.
Ash content	This information is required by disposal facility.
Distinctive odor	Odor is a means of determining waste consistency.
Organic components	This information is required by disposal facility.
Heavy metals	Both wastes contain barium and cadmium which are toxic at certain concentration levels.
Inorganic compounds	This information is required by disposal facility.

C-2b Sampling Methods

Acquisition of a representative sample of hazardous waste for subsequent chemical analysis is accomplished by preparing a composite of several subsamples of the waste. To ensure that the bulk of the waste is accurately represented by the composite sample, the sampling strategy includes collection of a minimum of three subsamples which provide integration of both the depth and the surface area of the waste as contained in the drums.

The sampling methods used for sampling each type of waste material generated at Synpro are described below.

FITLER PRESS AND FLOOR SWEEPING WASTE

The filter press and floor sweeping wastes are sampled using a thief sampler. A thief sampler consists of two slotted concentric tubes made of stainless steel or brass. The outer tube has a conical pointed tip which permits the sampler to penetrate the material being sampled (see Figure 4). The inner tube is rotated to open and close the sampler. The thief is inserted closed into the waste material. The inner tube is rotated to open the thief and wiggled to encourage material to flow into the thief. It is then closed and withdrawn. The sampler thief is placed in a horizontal position with the slots facing upward and inner tube removed from the thief to transfer sample to a container.

VINYL PLASTIC STABILIZER SCRAP

The vinyl plastic stabilizer scrap is sampled using a dipper. The dipper consists of a glass or plastic beaker

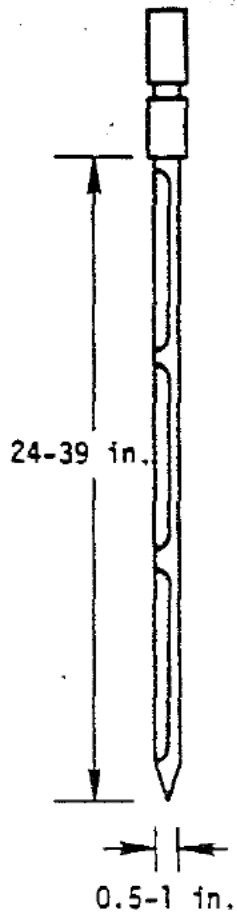


Figure 4. Thief sampler.

clamped to the end of a 2- or 3-piece pole which serves as the handle (See Figure 5.) The beaker, clamp, and handle are cleaned and assembled by bolting adjustable clamp to the pole. The beaker is placed in the clamp and fastened shut. The dipper is turned so the mouth of the beaker faces down and inserted into waste material. The beakers is turned right side up when dipper is at desired depth. The beaker is allowed to fill completely as shown by the cessation of air bubbles. The dipper is raised and sample transferred to a container.

C-1c Frequency of Analysis

The processes generating the waste are stable and therefore wastes do not vary significantly in composition. Each drum or container is sampled prior to disposal. This frequency of analysis is sufficient to ensure that analytical data is up-to-date. More frequent analysis is initiated if a change in the waste composition is suspected.

C-2d Analysis Methods

The analysis methods used for the hazardous waste generated and stored at Synpro are described in the following pages.

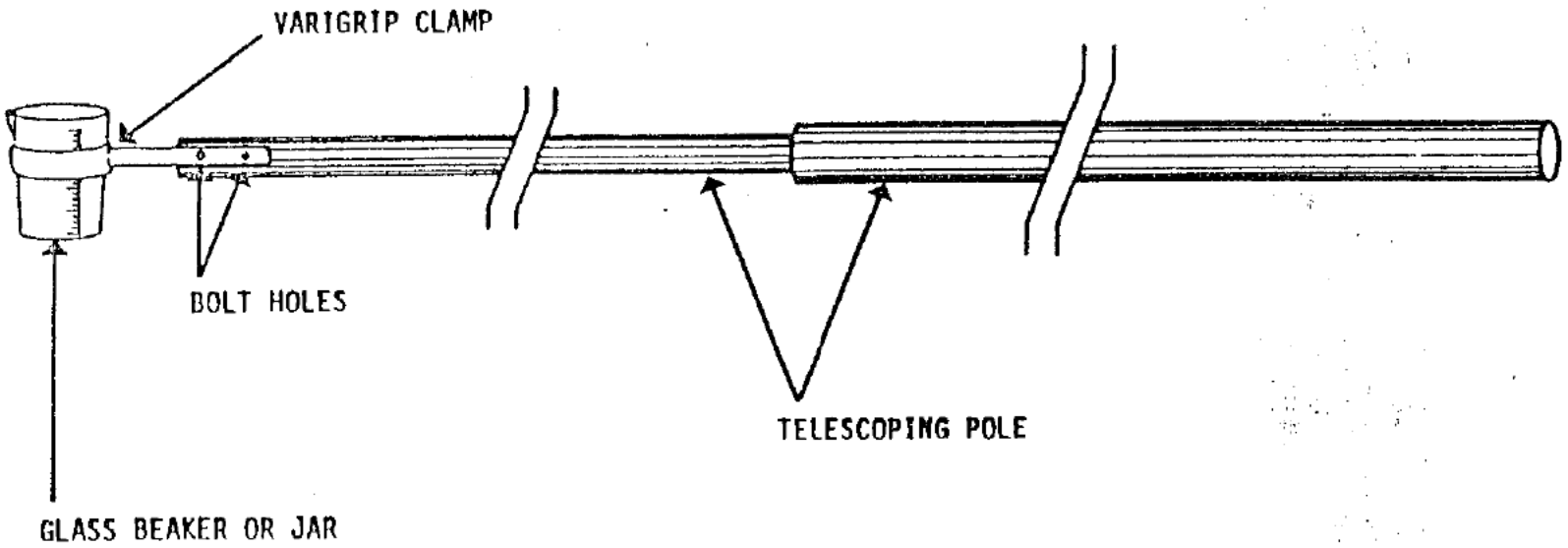


Figure 5. Dipper sampler.

ANALYSIS METHOD -SPECIFIC GRAVITY

This method is applicable to the determination of specific gravity on all currently produced powders and liquids. For liquids, the weight per gallon cup is filled according to directions and the sample is then weighed. The weight of the sample multiplied by the cup factor is specific gravity. For solid materials, the weight per gallon cup is used and specific gravity is determined by displacement.

APPARATUS

1. Regular weight per gallon cup.

2. Torsion Balance, or equivalent, capable of weighing to nearest 0.01 gram.

PROCEDURE

1. The weight per gallon cup, with its cover, is tared on the balance. The cup is removed from the balance and the liquid to be measureD is poured into the cup. The cover is placed on top and gently forced down to the extent of its travel. The excess material is removed from the cover and sides of the cup. The cup is then weighed to the nearest 0.01 gram. The weight in grams of the contents, divided by 10, is the weight per gallon. The weight of the contents, multiplied by 0.012, is the specific gravity.

2. The weight per gallon cup, with its cover, is tared on the balance. Solid material, ca. 5 grams, is placed in the cup and the net weight in grams (Ws) is determined. The cup is then filled with a liquid of known specific gravity (Note 1) and the total net weight in grams (Wt) is determined. The specific gravity of the solid is equal to the weight of the solid times the specific gravity of the liquid all divided by 83.2 times the specific gravity of the liquid plus the weight of the solid minus the total weight.

CALCULATIONS

For liquids:

$$\text{Weight per gallon} = \frac{\text{Net weight of liquid in grams}}{10}$$

$$\text{Specific gravity} = \text{Net weight of liquid in grams} \times 0.012$$

For solids:

$$S_s = \frac{W_s \times S_i}{(83.2\ S_i) + W_s - W_t}$$

where: S_s = Specific gravity of solid
W_s = Weight of solid
S_i = Specific gravity of liquid
W_t = Total weight

Report results to the nearest 0.001 units.

NOTE 1:

The liquid used must be capable of wetting the solid material. In the case of metallic soaps, ethyl alcohol is satisfactory. Determine the specific gravity fo the liquid in accordance with Procedure 1.

ANALYSIS METHOD -VISCOSITY AND COLOR

This method is applicable to all currently produced liquid materials having viscosities less than Z-6 and colors less than 18. The liquid sample is poured into a varnish tube and the viscosity is compared to reference standards. The viscosity is recorded as a letter. The tube is then placed in a color comparator and the color is recorded as a numeral.

APPARATUS

1. Varnish Comparator, Gardner, Hellige. Available from Gardner Laboratories, Inc., Bethesda, Maryland 20014.

2. Viscometer, Bubble, Varnish Series, A to T and U to Z-6, Gardner. Available from Gardner Laboratories, Inc.

3. Varnish Tubes, Grade B, with corks. Available from Gardner Laboratories, Inc.

PROCEDURE

Viscosity

The varnish tube is filled to the mark with the liquid to be checked and the cork stopper is inserted. An appropriate viscosity tube is inverted with the sample tube and the rate of rise of the bubble is compared. This procedure is continued until a match or near-match is obtained. The viscosity is then recorded as less than, equal to, or greater than the standard tube.

Color

The viscosity tube is placed in the varnish comparator and the color wheel is rotated until a match or near-match in color is obtained. The color is then recorded as less than, equal to, or greater than the appropriate standard color.

REPORTING RESULTS

Report results as being less than, equal to, or greater than the appropriate viscosity or color standards.

ANALYTICAL METHOD - TOTAL ASH, WASHED ASH, WATER SOLUBLE ASH

This method is applicable to the determination of ash or residue on ignition of all currently produced powders, except those containing cadmium. A sample is charred as completely as possible over a Fisher burner and the residue is then ignited to constant weight in a muffle furnace. The residue weight times 100 divided by the original sample weight is total ash. The sample and crucible is then placed in a 250 ml. beaker and covered with distilled water. The difference between total ash and washed ash is water soluble ash.

APPARATUS

1. Analytical balance with Class S weights.
2. Procelain crucibles, Coors #1, #1A, and #3.
3. Fisher burner, with support stand and nichrome triangle.
4. Muffle furnace, electric, Hoskins Model FD 202 or equivalent.
5. Beaker, Griffin, low form, 250 ml capacity.
6. Filter paper, Whatman #41 or equivalent.

PROCEDURE

1. Weigh to the nearest 0.1 milligram, 2-3 grams of sample into a tared crucible, Coors #1 or #1A. Place the sample and crucible in a Coors #3 crucible which is supported over a Fisher burner by means of a metal ring and nichrome triangle. Apply heat and ash the sample as completely as possible without causing the sample to flame. When the sample is charred, remove the crucible and residue and place it in the electric muffle furnace maintained at 1000 $\pm$50°C and ignite to constant weight. Cool in a desiccator and weigh. The residue is total ash. If washed ash or water-soluble ash is desired, retain the total ash residue and proceed under 2, below.

2. Place the crucible from the total ash determination into a 250 ml beaker. Cover the crucible and contents with distilled water and boil for 5 minutes. Cool and filter through a Whatman #41 paper and wash. Place the filter paper and its contents into the original tared crucible. Char off the paper and ignite again in the muffle furnace to a constant weight. Cool in a desiccator and reweigh. The residue is washed ash.

CALCULATIONS

$$\% \text{ Total ash} = \frac{\text{Weight of ash} \times 100}{\text{Sample weight}}$$

$$\% \text{ Washed ash} = \frac{\text{Weight of washed Ash} \times 100}{\text{Sample weight}}$$

% Water soluble ash = % total ash - % washed ash

Report results to the nearest 0.01%.

ANALYTICAL METHOD - ATOMIC ABSORPTION ANALYSIS

This method is applicable to all powder or liquid stabilizers. This method does not apply to the determination of trace metals. A weighed sample is digested with HCl and the concentration of the metal chlorides in solution is determined by atomic absorption.

APPARATUS AND REAGENTS

1. Beaker, Griffin, low form, 150 ml.
2. Analytical balance.
3. Hydrochloric acid, reagent, concentrated.
4. Volumetric flasks, 100 ml, Class A.
5. Beeswax
6. Filter paper, Whatman No. 41 or equivalent.
7. Atomic Absorption Spectrophotometer, Model 603.
8. Acetylene
9. Nitrous oxide
10. Four-inch single-slot burner head.
11. Nitrous oxide burner head.
12. Hollow cathode lamps.

PROCEDURE

Weigh to the nearest 0.1 mg., one gram of sample into a tared 150 ml beaker. Add 20 mls concentrated HCl and a few boiling chips. Place the beaker on a hot plate and cover it with a small watch glass to prevent loss of sample during boiling. If the sample is a solid, boil the solution until the fatty acid separates as a clear layer on the surface of the

liquid. If the sample is a liquid, boil it for 10 minutes. In either case, after the digestion of the sample is complete, add 40 mls of distilled water to the beaker and boil for an additional 10 minutes. After this, the beakers that contained the solid samples are removed from the hot plate and allowed to cool. The beakers containing liquid samples are taken off the hot plate and about one gram of beeswax is then added. The beakers are returned to the hot plate and boiled until the beeswax melts. The beakers are then removed from the hot plate and allowed to cool. The solid layer is lifted above the beaker and rinsed with a fine stream of distilled water. Care should be taken that all the rinse water goes into the beaker. After the solid layer has been rinsed, it may be discarded. Filter the solution through Whatman No. 41 filter paper into a 100 ml volumetric flask. Rinse the filter paper with small aliquots of distilled water and then discard the paper. Dilute to the mark with distilled water. Use the following steps for atomic absorption analysis for the determination of each element under consideration.

1. Follow manufacturer's operating instructions for all instrument settings and operations.

2. Prepare the sample dilutions and the standards by following the appropriate method depending on what metal is to be determined and concentration.

3. Run a series of standards and construct a calibration curve by plotting the concentrations of the standards against the absorbances.

4. Analyze, by the method of standard additions, samples, duplicates, spiked samples, and check standards.

CALCULATIONS

Calculate metal concentrations by the method of standard additions, or from a calbiration curve. All dilution or concentration factors must be taken into account. Concentrations reported for multi-phased or wet samples are appropriately qualified (e.g., 5 µg/g dry weight).

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT III
INSPECTION SCHEDULE

SYNPRO Div. of Dart Industries
U.S. EPA FACILITY ID #: OHD-077-783-603

F-2 Inspection Schedule

F-2a General Inspection Requirements

Synpro conducts regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous waste constituents and adversely affect the environment or threaten human health.

F-2a(1) Types of Problems

Table 2 presents a schedule for inspecting the container storage area, safety and emergency equipment, and security devices. The items listed in the table are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards. Provided with each item is a list of problems normally encountered.

F-2a(2) Frequency of Inspection

Also provided in Table 2 is a recommended frequency of inspection for each item.

F-2b Specific Process Inspection Requirements

F-2b(1) Container Inspection

Inspections of the container storage area will be conducted per the inspection schedule provided in Table 2. Results of each inspection will be recorded on inspection log sheets entitled, "Container Storage Area Inspection Log Sheet", "Safety and Emergency Equipment Inspection Log Sheet", and "Security Devices Inspection Log Sheet". The log sheets may be found in Figures 8, 9, and 10, respectively. Information requested on the log sheets includes the inspector's name and title, date and time

TABLE 2. INSPECTION SCHEDULE

Area/equipment	Specific item	Types of problems	Frequency of inspection
Container storage area	Container placement and stacking	Aisle space, height of stacks	Weekly
	Sealing of containers	Open lids	Weekly
	Labeling of containers	Improper identificiation, date missing	Weekly
	Containers	Corrosion, leakage, structural defects	Weekly
	Pallets	Damaged (e.g., broken wood, warping, missing)	Weekly
	Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Curb	Cracks, deterioration	Weekly
	Sump areas	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Debris and refuse	Clog sump pump, aesthetics, possible reaction with leaks	Weekly
	Ramps	Cracks, spalling, uneven settlement, erosion	Weekly
	Warning signs	Damaged	Weekly
Safety and emergency equipment	Standard industrial absorbents	Out of stock	Monthly/as needed
	Absorbent pads	Out of stock	Monthly/as needed
	55-gallon drums (steel, stainless steel)	Corrosion, structural damage	Monthly
	Extra protective eyeglasses	Broken or dirty equipment	Monthly
	Disposable respirators	Out of stock	Monthly/as needed
	Portable sump pump	Power, clogging	Monthly
	Fire blankets	Dispensing	As used
	Fire extinguishers	Need recharging	Monthly/after each use
	Fire alarm system	Power failure	Per NEPA
	Telephone system	Power failure	Per NEPA

(continued)

TABLE 2 (continued)

Area/equipment	Specific item	Types of problems	Frequency of inspection
Safety and emergency equipment (continued)	Public address (PA) system	Power failure, speakers	Per NEPA
	Emergency lighting system	Battery failure, lights	Per NEPA
	First aid equipment and supplies	Items out of stock or inoperative	As used
	Protective clothing (impermeable full body coveralls, gloves, and foot coverings)	Holes, normal wear and tear	As used
Security devices	Facility fence	Corrosion, damage to chain-link fence or barbed wire	Weekly
	Main, rear, and side gates and locks	Corrosion, damage to chain-link fence or barbed wire; sticking or corroding lock	Weekly
	Container storage building	Corrosion	Weekly
	Container storage building lock	Corrosion, damage sticking or corroding lock	Weekly

CONTAINER STORAGE AREA INSPECTION LOG SHEET

Inspector's name/title _____

Date of inspection _____ (month/day/year)

Time of inspection _____ (military time)

Item	Type of problems	Status (√)		Observations	Date and nature of repairs/remedial action
		Acceptable	Unacceptable		
Container placement and stacking	Aisle space, height of stacks				
Sealing of containers	Open lids				
Labeling of containers	Improper identification, date missing				
Containers	Corrosion, leakage, structural defects				
Pallets	Damaged (e.g., broken wood, warping, nails (missing)				
Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots				
Curb	Cracks, deterioration				
Sump area	Cracks, spalling, uneven settlement erosion, wet spots				
Debris and refuse	Clog sump pump, aesthetics, possible reaction with leaks				
Ramps	Cracks, spalling, uneven settlement, erosion				
Warning signs	Damaged				

Figure 8. Container storage area inspection log sheet.

SAFETY AND EMERGENCY EQUIPMENT INSPECTION LOG SHEET

Inspector's name/title _____ / _____
Date of inspection _____ (month/day/year)
Time of inspection _____ (time)

Item	Type of problems	Status (✓)		Observations	Date and nature of repairs/remedial action
		Acceptable	Unacceptable		
Standard industrial absorbents	Out of stock				
Absorbent boom	Out of stock				
55-gallon drums (steel, stainless steel)	Corrosion, structural damage				
Extra protection eyeglassas	Broken or dirty equipment				
Disposable respirators	Out of stock				
Portable sump pump	Power, clogging				
Fire blankets	Dispensing				
Fire extinguishers	Needs recharging				
Fire alarm system	Power failure				
Telephone system	Power failure				
Public address system	Battery failure, lights				
Emergency lighting system	Battery failure, lights				
First aid equipment and supplies	Items out of stock or inoperative				
Protective clothing (impermeable full-body coveralls, gloves, and foot coverings)	Holes, normal wear and tear				

Figure 9. Safety and emergency equipment inspection log sheet.

SECURITY DEVICES INSPECTION LOG SHEET

Inspector's name/title _____/_____

Date of inspection _____ (month/day/year)

Time of inspection _____ (military time)

Item	Type of problems	Status (✓)		Observations	Date and nature of repairs/remedial action
		Acceptable	Unacceptable		
Facility fence	Corrosion, damage to chain link fence or barbed wire				
Main, rear and side gates and locks	Corrosion, damage to chain link fence or barbed wire; sticking or corroding lock				
Container storage building	Corrosion, damage to building				
Container storage building door and lock	Corrosion, damage to door sticking or corroding lock				

Figure 10. Security devices inspection log sheet.

of inspection, item of inspection, typical problems encountered, status of the item, observations, and the date and nature of repairs and remedial action. Typical problems encountered with each item of inspection, included in the inspection schedule, are provided on the log sheet to serve as a reminder to the inspector and to ensure a complete inspection. The inspector is required to check the status of each item and indicate whether its condition is acceptable or unacceptable. Regardless of the status, observations are made as to the number of containers, aisle space, height of container stacking, inventory quantities, observation of leakage, and more. If the status of a particular item is unacceptable, appropriate and complete information is recorded, including date and nature of repairs and remedial action.

F-2c Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately. Synpro personnel will notify the appropriate authorities per the Contingency Plan (see Section G) and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the Contingency Plan for further details.

F-2d Inspection Log

An inspection log is maintained for each calendar year in a three-ring binder that is subdivided by sections for each area/equipment. After an inspection, each log sheet is filed in the binder according to area/equipment, which provides a case history of a particular item. The inspection log notebook is always kept with the inspection schedule in the Plant Manager's office. As required, records of inspections are kept for at least 3 years from the date of inspection.

F-3 Waiver of Preparedness and Prevention Requirements

The applicant does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR §264 Subpart C. Requirements of this Subpart are primarily addressed in Sections D, F, and G of this application.

F-3a Equipment Requirements

Internal and external communications, emergency equipment, and fire control equipment are discussed in Sections F and G.

F-3b Aisle Space Requirements

Aisle space requirements are addressed in Sections D-1a(2), F-5c, and G.

F-4 Preventive Procedures, Structures, and Equipment

F-4a Loading/Unloading Operations

Loading operations at the facility, other than removal operations at the container storage area, take place in the processing area. Wastes generated in the processing area are collected in hoppers and loaded into drums for transport to the container

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT IV
PERSONNEL TRAINING PLAN

SYNPRO Div. of Dart Industries
U.S. EPA FACILITY ID # OHD-077-783-603

ATTACHMENT IV

SECTION H

PERSONNEL TRAINING

The information contained in this section outlines the personnel training program for Synpro's hazardous waste storage facility in accordance with the requirements of 40 CFR §122.25(a)(12) and §264.16.

H-1 Outline of Training Program [40 CFR 122.25(a)(12)]

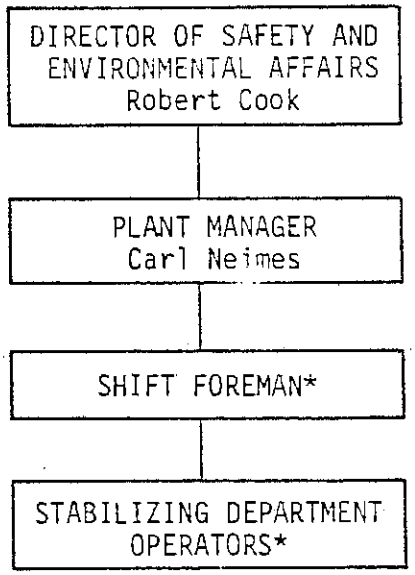
H-1a Job Titles and Duties

Figure 17 shows the organization of personnel at the facility. Only two employee categories are directly involved with the handling of waste: the shift foreman, and the stabilizing department operators. Management responsibilities involving compliance with RCRA regulations but not involving actual handling of the wastes are split between the Plant Manager and Director of Safety and Environmental Affairs. Maintenance personnel (i.e., electricians and mechanics) work in the waste handling area, but they do not handle wastes directly. The duties, responsibilities, and qualifications of each position follow:

Position Title: Director of Safety and Environmental Affairs

Position Responsibilities and Duties:

- Maintains facility compliance with environmental regulations and permits including RCRA.



* Indicates those personnel directly involved with hazardous waste activities. Due to contract obligations with labor union names of these employees cannot be released, but are kept in a confidential file on site.

Figure 17. Organization chart for Synpro's HWM facility.

- Responsible for informing Plant Manager of potential safety and environmental hazards and proposing specific solutions.

- In charge of personnel training porgram. As Training Director is responsible for preparing and teaching training course on safety and proper handling and management of hazardous waste and materials.

Experience and Qualifications:

- B.S. from a 4 year college

- 5 years experience in environmental affairs

Position Title: Plant Manager

Position Responsibilities and Duties:

- Overall operation and maintenance of entire plant including hazardous waste storage area.

- Makes decisions on solutions to hazards proposed by Safety and Environmental Affairs Director.

- Primary Emergency Coordinator

Experience and Qualifications:

- B.S. from 4 year college in Chemistry or Chemical Engineering

- 5 years experience

Position Title: Shift Foreman

Position Responsibilities and Duties:

- Oversees operators and reviews their performance.

- Trains operators to operate materials/drum handling equipment safely and handle leaks, spills, and emergency situations

- Maintains operating log, monitoring records, maintenance records, inspection records, personnel training records, and all other required records.

- Notifies plant manager, Director of Safety and Environmental Affairs, and if so directed, proper authorities in emergency situations.

- Schedules all maintenance and repairs to structures and equipment for the plant.

- Oversees mechanic/electrician doing both scheduled and unscheduled maintenance and repair work to be sure he is not releasing hazardous wastes to the environment or contaminating himself.

Experience and Qualifications:

- High school diploma

- 2-3 years experience in plant operation.

- Hazardous waste management experience helpful but not required.

  Note: If applicant has no hazardous waste experience, special training in the functions and operation of a hazardous waste storage facility will be required before assuming job responsibilities. This training will be provided by Synpro.

Position Title: Stabilizing Department Operators

Position Responsibilities:

- Reports to shift foreman.

- Operates waste handling equipment.

- Inspects containers storage equipment, and any gauges, dials, and recorders as required for proper operation and structural integrity.

- Inspects emergency equipment on a regular basis.

- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.

- Makes appropriate entries into operating log, monitoring records, inspection records, and maintenance records, and files them according to established system.

- Notifies foreman and other plant authorities as necessary in emergency situations.

- Takes emergency action on own authority in accordance with established procedures.

Experience and Qualifications:

- 1-3 years experience as plant operator with related activities.

H-1b Training Content, Frequency, and Technique

The program developed at Synpro for training employees in the safe handling of hazardous wastes has been organized into a "training manual." Provisions are made for updating or revising the text as necessary to ensure compliance with the terms of the RCRA permit. Each employee has his or her own copy of the manual. An outline of the training manual is shown in Figure 18. This training manual is kept on file at the facility, and is available to EPA officials for review.

During the training program, employees are instructed on (1) the hazardous nature of chemicals and chemical wastes in general, (2) the purpose of RCRA and importance of maintaining compliance with RCRA regulations, (3) the hazardous nature of the wastes being stored in the facility, (4) proper handling and storage procedures for wastes, (5) emergency procedures and contingency plan.

The manual is used as the basis or framework for training Synpro personnel in the proper procedures, equipment, and systems to be used in managing hazardous wastes.

For key personnel, Synpro supplements the training outlined in the manual with attendance at one or more technical seminars or training programs on hazardous materials. A list of such seminars or programs is included in Appendix C of the training manual.

Preface

1.0 Introduction

- 1.1 Chemical hazards
- 1.2 The Resource Conservation and Recovery Act - RCRA

2.0 Facility and Process Description

- 2.1 Description of wastes to be managed
- 2.2 Description of storage facility
- 2.3 Key terms of the permit
- 2.4 Normal/routine operations
- 2.5 Waste analysis
- 2.6 Recordkeeping and reporting requirements
- 2.7 Security
- 2.8 Inspections

3.0 Emergency Procedures and Contingency Plans

- 3.1 Emergency coordinator
- 3.2 Emergency procedures
- 3.3 Emergency communications/phone numbers and alarms
- 3.4 Location, maintenance, inspections, and use of emergency equipment
- 3.5 Spill control and response to groundwater contamination incidents
- 3.6 Fires and explosions
- 3.7 Power interruption or failure
- 3.8 Tornadoes, hurricanes, and severe storms

Appendix A Summary of RCRA Regulations for Hazardous Waste Storage Facilities

Appendix B Summary of Conditions Specific in Synpro's RCRA Permit

Appendix C Training Programs in Hazardous Waste Management

Figure 18. Outline of Hazardous Waste Training Manual.

A brief description of each section of the training manual follows:

Section 1 - Introduction

This section of the manual introduces Synpro employees to the general classes and characteristics of chemicals and chemical wastes that can be hazardous to health and property. In this context, the terms toxicity, reactivity, corrosivity, and ignitability are defined. It is Synpro's policy that each employee handling chemical substances respect them and be aware of these potential hazards. The company's policy on the use of protective clothing and safety equipment to prevent accidental worker exposures and releases to the environment of hazardous chemicals and wastes is introduced.

The authority for regulating hazardous wastes under the Resource Conservation and Recovery Act (RCRA) also is discussed. The regulatory framework for classifying hazardous wastes, setting operational standards, and permitting procedures and achieving compliance is explored. The RCRA permit for Synpro (once it is received) will also be studied to be sure that each employee is familiar with its terms.

Section 2 - Storage of Hazardous Wastes at Synpro

This section focuses on the types of hazardous wastes that are handled and stored at Synpro, normal/routine storage operations, and procedures for maintaining compliance with the RCRA permit (e.g., waste analysis, recordkeeping, inspections, and

security). A site diagram showing the dimensions, capacity, and relative position of each storage area (tanks, containers, and piles) is included.

Training for normal or routine operating conditions includes the following topics:

- Proper operation and maintenance of the storage facility
- Scheduled inspections
- Purpose and use of security and communications systems
- Monitoring requirements for tracking and recording the operation of the facility
- Recordkeeping requirements and procedures

Section 3 - Emergency and Contingency Plans

The third section of the training manual provides detailed instruction on steps to be taken in the event of an emergency such as a waste spill or fire, power outage, or damage from wind and storms. The emergency coordinator, Mr. Robert Cook is clearly identified, as are emergency phone numbers and directions for locating and using onsite emergency equipment, alarms, and communications. Contingency plans are also detailed.

This manual is used in classroom training for both introductory training and annual review. All personnel involved with hazardous waste are required to complete classroom training in addition to on-the-job training. Also personnel receive a classroom review training session once a year. This is supplemented with attendance by the Director of Safety and Environmental Affairs at seminars and conferences involving hazardous waste management.

H-1c Training Director

The personnel training program is directed by Mr. Robert Cook, the Director of Safety and Environmental Affairs. Mr. Cook has been with Synpro in excess of 25 years. He has a B.S. degree in Chemistry. He has been trained in all aspects of Hazardous Waste Management and attended various seminars on this subject. Records of his previous and ongoing training are kept on file at the personnel office.

H-1d Relevance of Training to Job Position

Mr. Robert Cook, is also responsible for teaching hazardous waste management procedures, including contingency plan implementation, to all waste handling personnel. The training program is tiered (Figure 19) in some areas to provide training to personnel at levels that are relevant to their positions within the plant. For example, the shift foreman receives training in recordkeeping and other procedures required for compliance, whereas the operators do not. Operators are more specifically trained to maintain proper and safe operating procedures and to respond effectively in the event of a spill or other emergency. The more experienced operators are given a broader range in training than their assistant operators.

H-1e Training for Emergency Response

This training program is designed to ensure that personnel not only handle hazardous wastes in a safe manner but also properly respond to emergency situations. The program trains hazardous waste handling/management personnel to maintain compliance under both normal operating conditions and emergency conditions.

	Personal safety	Release prevention and response	Contingency plan	Emergency procedures	Hazardous waste management and practices	Record keeping	Hazardous waste handling and operations
Director of Safety and Environmental Affairs	B	B	B	B	B	B	B
Plant Manager	B	B	B	B	B	B	B
Shift Foreman	B	B	B	B	B	B	B
Operators	B	B	B	B	L	L	B

B = broad instruction
L = limited instruction

Figure 19. Level of training for hazardous waste personnel.

Training elements addressing nonroutine and emergency situations (unscheduled shutdowns and startups related to storms, power outages, fires, explosions, spills) include:

- Procedures for locating, using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Emergency communication procedures and alarm systems
- Response to fires or explosions
- Response to ground water contamination incidents and procedures for containing, controlling, and mitigating spills
- Shutdown of operations and power failure procedures

In addition to the hazardous waste management personnel, a company fire brigade is on standby for response to incipient fires and other general plant emergencies. This fire brigade is trained both with classroom training methods and fire drills. The classroom training is required for introductory training and as an annual review for each member assigned to the fire brigade. The fire brigade training is not addressed in the hazardous waste training manual. The fire drills occur at a minimum of six times a year and are unannounced.

H-2 Implementation of Training Program

The director of the training program and all current waste-handling personnel have been or are being trained at the time of this submittal. In the future, all new personnel will complete this training program within 6 months of assignment to the hazardous waste storage facility or within 6 months of their date of employment, whichever is later. No employee hired to work at

this facility will work unsupervised prior to completion of the training program.

Employees are required to meet annually for review and update of this training program and to discuss and study the following subjects:

1) All hazardous wastes currently being handled at the facility, noting any changes in waste type, volume, source, characteristics, or location that have occurred during the past year.

2) The status of storage and operating conditions and procedures, noting any areas where there are problems or potential for problems. Employees participate in developing effective solutions.

3) The requirements contained in the facility's RCRA permit, noting any changes that have occurred during the past year. Areas where maintenance of compliance is a problem are identified and discussed, and effective solutions are sought.

4) Incidents that have occurred in the past year that warranted use of the contingency plans and/or emergency action. This review focuses on the cause of the incident and identification of steps to be taken to prevent or to ensure better handling of such events in the future.

The annual review will also utilize the facility's annual report to EPA as a working document for the review.

Records documenting the job title for each position, job descriptions, names of employees, and completed training programs (both introductory and review) will be kept in the confidential files of the personnel office at Synpro. These records will be kept until closure of the facility for current employees and for 3 years from the date of the individual employee's termination for former employees.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT V
CONTINGENCY PLAN

SYNPRO Div. of Dart Industries
U.S. EPA FACILITY ID #: OHD-077-783-603

ATTACHMENT V

SECTION G

CONTINGENCY PLAN

The information contained herein is submitted in accordance with the requirements for a Contingency Plan, as contained in 40 CFR §122.25(a)(7) and §264 Subpart D.

CONTINGENCY PLAN [40 CFR 122.25(a)(7)]

The intent of §264, Subpart D (Contingency Plan and Emergency Procedures), of RCRA is to ensure that facilities that treat, store, or dispose of hazardous wastes have established the necessary planned procedures to follow in the event an emergency situation should arise.

The intent of the requirements under 40 CFR §264, Subpart C (Preparedness and Prevention), which was described in Section F, is to ensure that the facility is properly designed and equipped to minimize the possibility of accidents and prevent the occurrence of emergency situations. The requirements under 40 CFR §264 Subpart D address the actions that are to be taken if an accident should occur.

G-1 GENERAL INFORMATION

This contingency plan is for the Synpro division of Dart Industries, Inc., located at 1636 Wayside Road, Cleveland, Ohio 44112. Synpro is primarily a manufacturer of heavy metal soaps

and PVC stabilizers. G. B. Curtiss is the President of Synpro and his work phone number is (216) 991-7337. Carl Neimes is the manager and his home telephone number is Redacted [redacted]. Mr. Neimes is the primary emergency coordinator at the facility and may be reached at (216) 532-6010 from 8 a.m. to 5 p.m. on week days. Other emergency coordinators may be reached at this telephone extension during other hours. Details on this are found in the following section.

Synpro stores hazardous waste in containers in one location. The container storage area has a maximum storage capacity of 80 drums. A general site plan and a full description of the facility is contained in Section B of this RCRA permit application. A characterization of the hazardous wastes is contained in Section C. Copies of the Contingency Plan have been provided to the local emergency organization with Sections B and C included in Appendices.

G-2 EMERGENCY COORDINATORS

If an emergency situation develops at the facility, the discoverer should contact an emergency coordinator listed in Table 3. Carl Neimes, primary Emergency Coordinator, should be contacted first, and if he is not available, the others should be called (in the order listed) until someone is reached. The primary Emergency Coordinator and alternates have complete authority to commit all resources of the company in the event of an emergency. Table 4 lists organizations that could possibly be contacted by the Emergency Coordinator in the event of an emergency.

TABLE 3

EMERGENCY COORDINATORS

Name	Title	Home address	Work phone No.	Home phone No.
Carl Neimes	Plant Manager	Redacted	532-6010	Redacted
Robert Cook	Direct of Safety/Envi-vionmental Affairs	Redacted Redacted	532-6010	
Roy Steffen	Direct. of Engineering	Redacted	532-6010	
Charles Fletcher	V.P., Operations	Redacted Redacted	532-6010	

TABLE 4

EMERGENCY CONTACTS

Emergency	Organization/agency	Emergency No.
Injury	Huron Road Hospital Paramedic Ambulance	761-4242 771-3355
Fire/explosion	Fire Department	621-1212
Hazardous material spill or release	Fire Department	621-1212

G-3 IMPLEMENTATION OF THE CONTINGENCY PLAN

The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the emergency coordinator in making this decision by providing decision-making criteria. The contingency plan will be implemented in the following situations:

1. Fire and/or Explosion

   a. The fire spreads and could possibly ignite materials at other locations onsite or could cause heat-induced explosions.

b. The fire could possibly spread to offsite areas.

c. Use of water or water and chemical fire suppressant could result in contaminated runoff.

d. An imminent danger exists that an explosion could result in release of toxic material.

e. An explosion has occurred.

2. Spills or Material Release

a. The spill could cause the release of toxic liquids.

b. The spill can be contained onsite, but the potential exists for ground water contamination.

c. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

G-4 EMERGENCY RESPONSE PROCEDURES

G-4a Notification [40 CFR 264.56(a)]

In the event of an emergency situation the emergency coordinator will be notified first; subsequently, all facility personnel, appropriate federal, state, or local agencies, and fire or police departments will also be notified. See Figure 11 for an overview of the emergency plan of action.

G-4b Identification of Hazardous Wastes [40 CFR 264.56(b)]

The emergency coordinator will immediately identify the character, exact source, amount and area extent of the release. The initial identification method will be to utilize visual analysis of the material and location of the release. If for some reason the released material cannot be identified, samples will be taken for chemical analysis.

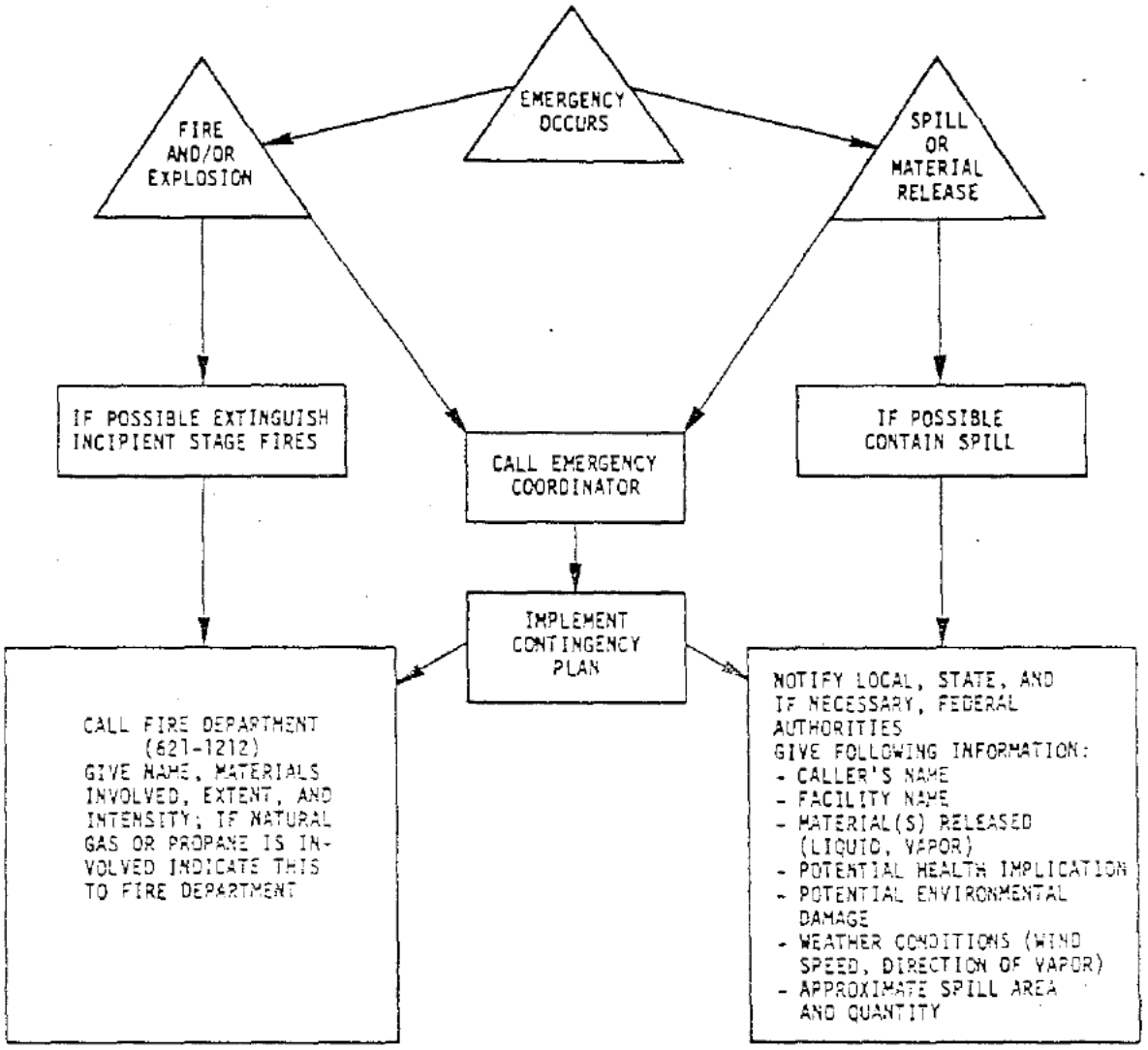


Figure 11. Emergency plan of action.

G-4c Assessment [40 CFR 264.56(c) and (d)]

The emergency coordinator will assess possible hazards, both direct and indirect, to human health or the environment.

G-4d Control Procedures [40 CFR 264.52(a)]

Potential accidents fall under three general classifications: (1) fire and/or explosions, (2) spills or material release, (3) natural disasters such as earthquakes or tornados. These are discussed in detail in the following sections.

Fire and/or Explosion

The container area can be easily accessed by fire-fighting and other emergency vehicles and equipment. A paved blacktop road, about 25 ft in width, passes immediately in front of the container sotrage area. This road is kept clear at all times.

A company fire brigade will be on standby during all general plant emergencies. During times of power failure or severe weather, fire protection personnel will be assigned to protect personnel and property. If a fire should break out, concentration will be placed on preventing the fire from spreading to nearby areas. The fire-fighting effort will be carried out for incipient stage fires only. Beyond this point, all fires will be handled by the local fire department.

The following actions will be taken in the areas affected by the fire or explosion:

1. Fire doors in buildings will be closed.
2. Hazardous work in all areas will be shut down immediately.

3. All operations and equipment in the immediate area will be shut down, as necessary and practical.

4. The Emergency Coordinator will be notified immediately (See Table 3).

5. The area will be cleared of all personnel. These persons are to report to the parking lot for accountability. Figures 12, 13, and 14 show the evacuation routes to be used by the lab area, plant, and office personnel, respectively.

6. All injured persons will be removed, and medical treatment will be administered by qualified personnel.

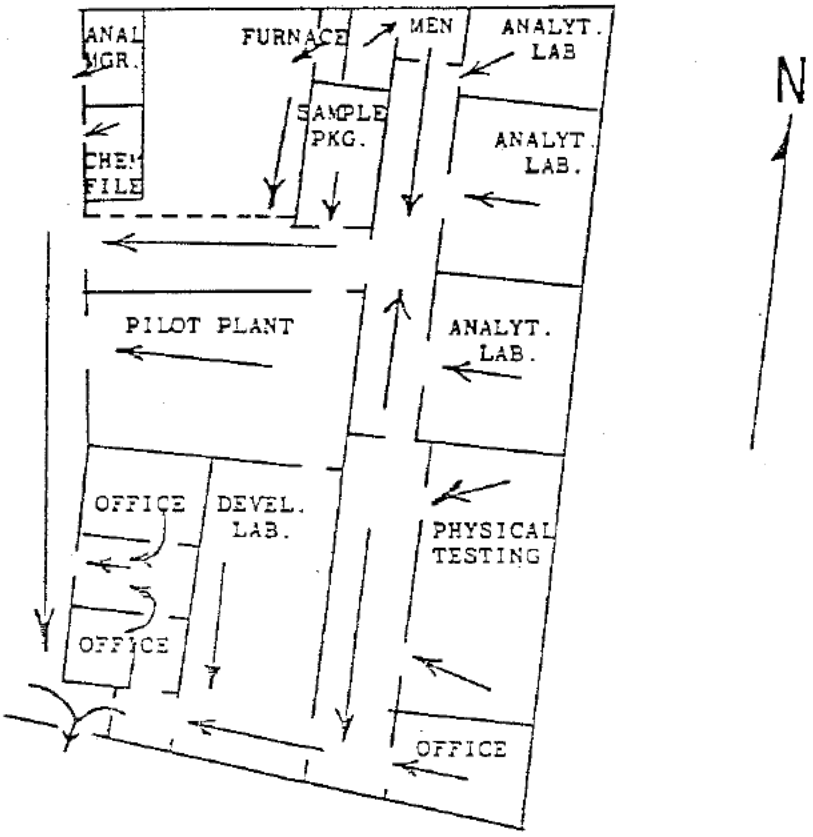
Vehicular traffic and hazardous work in the area will cease until the spill is contained and safety is restored. Fire fighting will not be done at the risk of injury to the persons involved; however, early control of fires can significantly decrease total damage. Notification procedures are given in Figure 11. The plant receptionist will not be called unless absolutely necessary so that she/he remains free to handle only emergency calls.

Area or plant evacuation will be necessary in case of major fire or explosion. Specifics are outlined under general evacuation procedures. All personnel have been trained in evacuation procedures and means of exit from their respective work areas.

Until evacuation is signaled, personnel who are not in an affected area will stay in their respective work areas. Contract personnel and visitors will be cleared from the area and instructed to report to a guard house or office area.

The fire brigade chief will be responsible for all fire fighting efforts until outside help arrives. Such efforts are

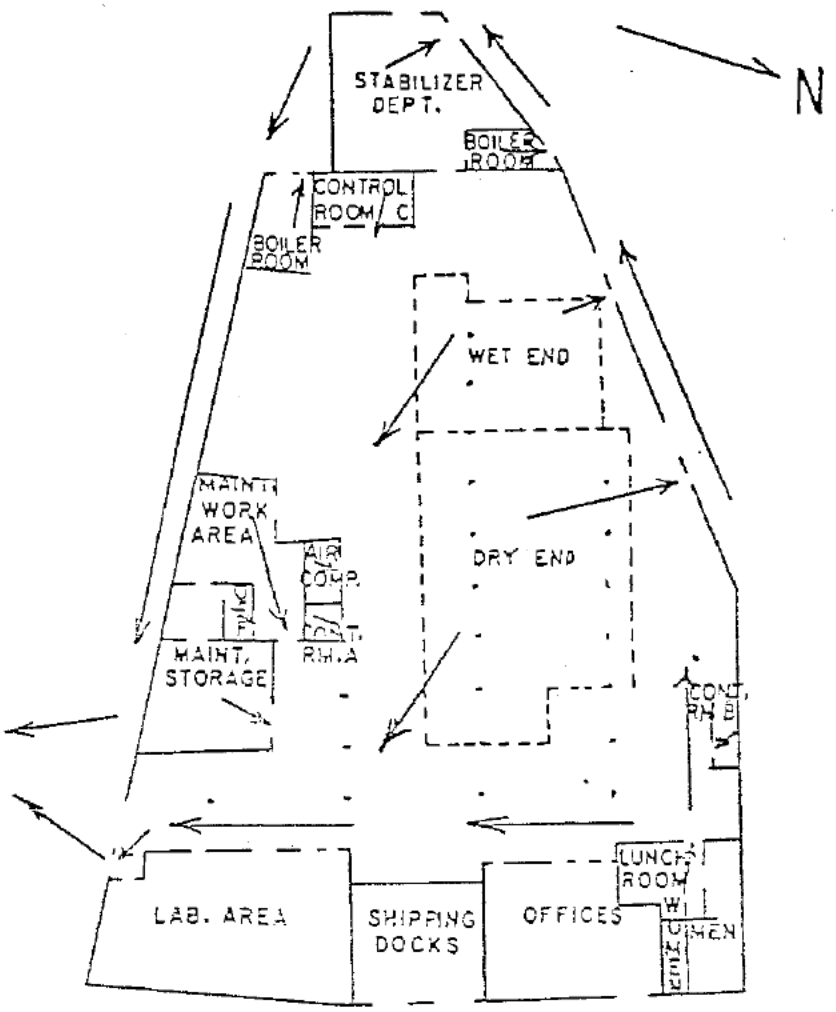
SYNTHETIC PRODUCTS DIVISION
EMERGENCY EVACUATION ROUTES
LAB. AREA – 1636 WAYSIDE ROAD
EVACUATION ALARM – Phone or runner
FOLLOW ARROWS – DO NOT RUN



WALK TO EXIT DESIGNATED
WALK TO PARKING LOT
DO NOT BLOCK ROADWAYS

Figure 12. Evacuation routes form lab area.

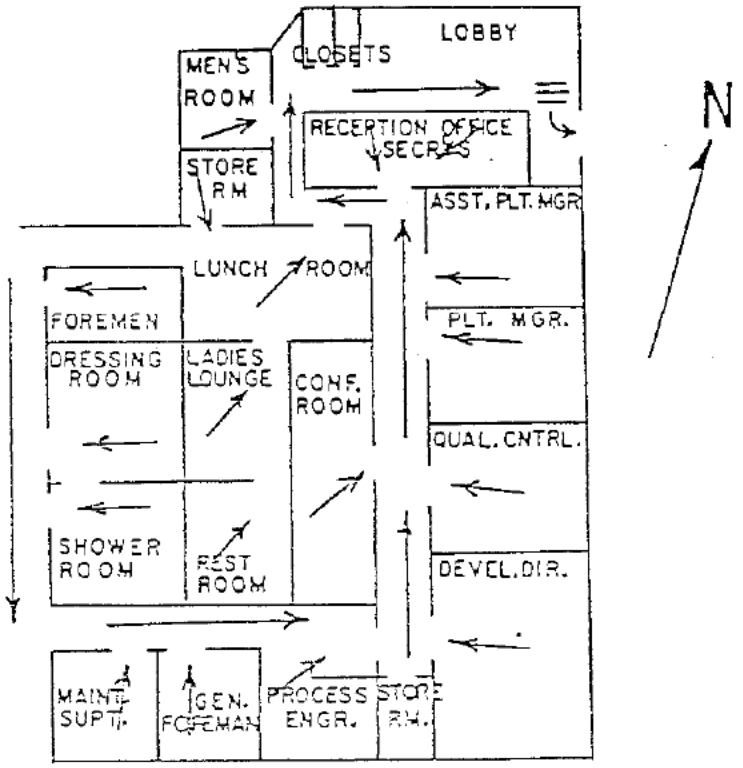
SYNTHETIC PRODUCTS DIVISION
EMERGENCY EVACUATION ROUTES
PLANT – 1636 WAYSIDE ROAD
EVACUATION ALARM – Runner or Hand Signals
FOLLOW ARROWS – DO NOT RUN



WALK TO EXIT DESIGNATED – WALK TO PARKING LOT – DO NOT BLOCK ROADWAYS

Figure 13. Evacuation routes from plant area.

SYNTHETIC PRODUCTS DIVISION
EMERGENCY EVACUATION ROUTES
OFFICE AREA – 1636 WAYSIDE ROAD
EVACUATION ALARM – Phone or Runner
FOLLOW ARROWS – DO NOT RUN
WALK TO EXIT DESIGNATED



WALK TO PARKING LOT
DO NOT BLOCK ROADWAYS

Figure 14. Evacuation routes from office area.

concerned primarily with helping personnel evacuate if necessary. The fire brigade chief is always the lead shift foreman. Supervisors of unaffected areas will stay with their personnel and be ready to evacuate and account for the persons under their supervision.

An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered. The fire brigade chief will determine when the emergency has passed and consult with the Emergency Coordinator before the "all clear" signal is given. All emergency equipment used in the emergency must be cleaned and fit for use prior to resumption of plant operation in the affected areas.

Spills or Material Release

In the event of a major emergency involving a chemical spill, the following general procedures will be used for rapid and safe response and control of the situation. Emergency contacts found in Figure 11 provide a quick-reference guideline to follow in the event of a major spill.

If an employee discovers a chemical spill or process upset resulting in a vapor release, he or she will immediately report it to the area supervisor.

The area supervisor will contact the designated Emergency Coordinator at the time of the incident. When contacted, the designated Emergency Coordinator will obtain information pertaining to the following:

1. The material spilled or released.

2. Location of the release or spillage of hazardous material.

3. An estimate of quantity released and the rate at which it is being released.

4. The direction in which the spill is heading.

5. Any injuries involved.

6. Fire and/or explosion or possibility of these events.

7. The area and materials involved and the intensity of the fire or explosion.

This information will help the Emergency Coordinator to assess the magnitude and potential seriousness of the spill or release. If the accident is determined to lie within the company's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary inplant personnel. If the accident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies. A list of agencies and phone numbers can be found in Table 4.

The initial response to any emergency will be to protect human health and safety, and then the environment. Identification, containment, treatment, and disposal assessment will be the secondary response.

If for some reason a chemical spill is not contained within a dike or sump area, an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the materials involved. If the spill is large and involves a rupture of containers, an initial isolation of at least 100 ft in all directions will be used. Small

spills or leaks from container will require evacuation of at least 50 ft in all directions to allow cleanup and repair and to prevent exposure. When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. If possible the area will be roped or otherwise blocked off.

If the spill results in the formation of a toxic vapor cloud (by reaction with surrounding materials or by outbreak of fire) and its release (due to high vapor pressures under ambient conditions), further evacuation will be enforced. An area at least 500 ft wide and 1000 ft long will be evacuated downwind if volatile materials are spilled.

As called for in regulations developed under the Comprehensive Environmental Liability and Compensation Act of 1980 (Superfund), our practice is to report a spill of a pound or more of any hazardous material for which a reportable quantity has not been established and which is listed under the Solid Waste Disposal Act, Clean Air Act, Clean Water Act, or Toxic Substances Control Act. We also follow the same practice for any substances not listed in these Acts but which can be classified as a hazardous waste under RCRA.

If the Emergency Coordinator determines that the company is unable to handle the emergency, then local, state, and Federal authorities will be notified of the situation. Evacuation of all potentially affected plant areas will be initiated as soon as possible.

Most waste spills and leaks are easily contained within the dikes and sumps provided in the container storage area. Small spills occurring in a diked area are flushed with plenty of water, to the sump provided in that area. If necessary, a portable sump pump is used to pump the diluted waste material into 55-gallon drums.

For all large spills or serious leaks the person discovering the discharge will leave the immediate area and contact the Emergency Coordinator. The Emergency Coordinator will obtain the following information:

- Person(s) injured and seriousness of injury.
- Location of the spill or leak, material involved.
- The approximate amount spilled, an estimate of the liquid discharge rate, and the direction the liquid is moving.
- Whether or not a fire is involved.

Next, the Emergency Coordinator will initiate evacuation of the hazard area. For small spills or leaks, isolate at least 50 ft in all directions. For large spills, initially isolate at least 100 ft in all directions and keep all persons upwind of spill. The emergency coordiator will also obtain medical attention for any injured persons. It may be helpful to instruct the caller in initial first aid procedures. Then call the hospital.

Emergency personnel will be dispatched to the site to take the appropriate action. The proper authorities will be contacted (Figure 11 and Table 4) if the spill or release is large. Local authorities will be contacted if necessary.

Cleanup personnel will make sure all unnecessary persons are removed from the hazard area. They will then put on protective clothing and equipment. If possible they will try to stop the leak. Special materials will be kept on hand for temporary repairs.

Cleaning personnel will remove all surrounding materials that could be especially reactive with materials in the waste and determine the major components in the waste at the time of the spill. They will use absorbent pads, booms, earth, sand, and other inert materials to contain, divert and clean up a spill if it has not been contained by a dike or sump. Most spills contained within the dike or sump can be pumped back into the appropriate storage drum.

They will place all containment and cleanup materials in drums for proper disposal. Some items, such as absorbent rags or booms may have to be cut up. Also all recovered liquid wastes and contaminated soil will be placed in drums for removal to an approved disposal site.

Natural Disasters

It is assumed that a natural disaster may result in fire, explosion, or release of hazardous waste. Therefore, guidelines established under these emergency conditions (fire, explosion or spills) will be used for contingencies from a natural disaster.

G-4e Prevention of Recurrence or Spread of Fires, Explosions or Releases [40 CFR 264.56(e)]

Actions to prevent the recurrence or spread of fires, explosions or releases include stopping processes and operations, collecting and containing released waste, and recovering or isolating containers. The onsite training manual addresses the specific actions to be taken in an emergency. In addition, if the facility stops operations in response to an emergency, the emergency coordinator will monitor equipment for leaks, pressure build up, gas generation or ruptures.

G-4f Storage and Treatment of Released Material [40 CFR 264.56(g)]

Immediately after an emergency, the emergency coordinator will make arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, surface water, or any other contaminated material.

G-4g Incompatible Wastes [40 CFR 264.56(h)]

The emergency coordinator will ensure that no wastes which may be incompatible with the released material are treated, stored or disposed of until cleanup procedures are completed.

G-4h Post-Emergency Equipment Maintenance [40 CFR 264.56(h)(2)]

After an emergency event, all emergency equipment listed in Section G-5 will be cleaned so that it is fit for use or it will be replaced. Before operations are resumed an inspection of all safety equipment will be conducted as discussed in Section F-2. The EPA regional administrator, state, and local authorities

will be notified that post-emergency equipment maintenance has been performed and operations will be resumed.

G-4i Container Spills and Leakage [40 CFR 264.171]

Refer to section G-4d for a discussion of emergency response procedures for container spills and leakage.

G-5 Emergency Equipment

Location of emergency equipment is shown on Figure 15. The plant employs several mechanisms for fire control. First, one fire hydrant are located in the plant and two immediately outside the plant area. Each will deliver 500 gal/min of water. Approximately 500 ft of hose is stored in the plant area.

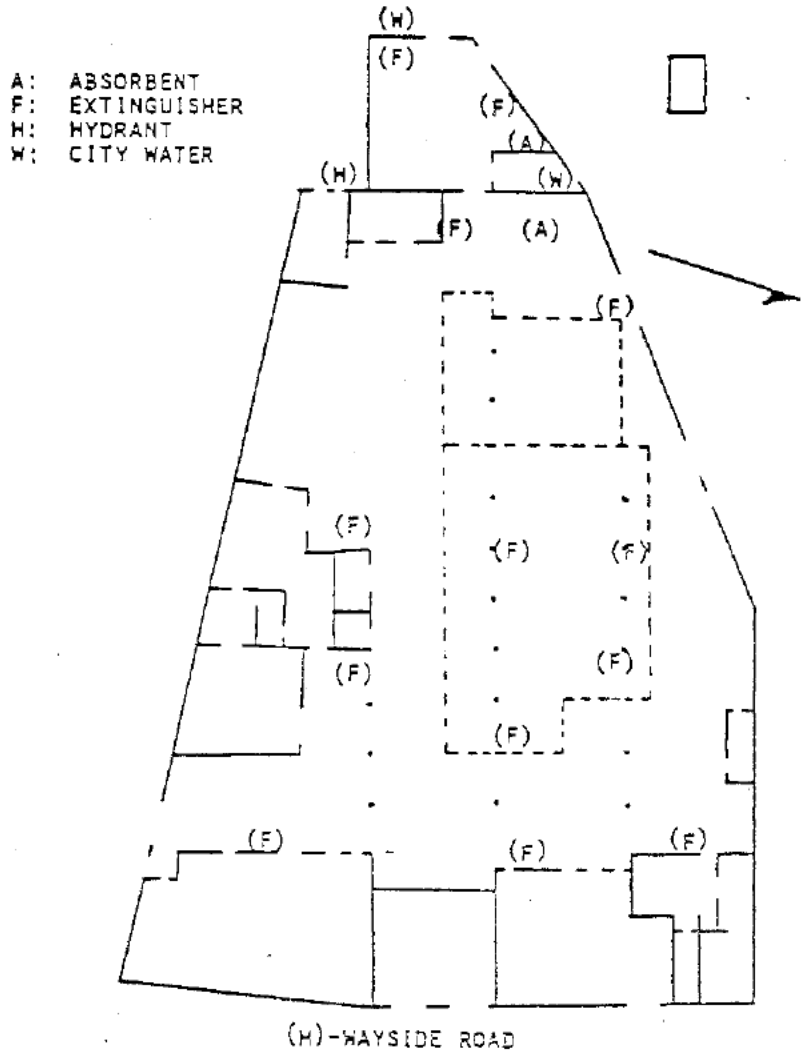
Also available for fire control are portable fire extinguishers; at least one extinguisher is located in each of the following areas:

- Container storage area
- Processing area
- Warehouse
- Electric substation
- Lab
- Offices

These fire extinguishers are dry chemical Types A, B, and C. Type A is capable of extinguishing fires involving ordinary combustible materials such as wood, cloth, paper, rubber, and many plastics; Type B is capable of extinguishing fires involving flammable liquids, oils, greases, tars, oil base paints, lacquers, and flammable gases; and Type C is capable of extinguishing fires involving energized electrical equipment. All extinguishers comply with National Fire Code standards for portable fire extinguishers, and they are inspected after each

SYNPRO
DIVISION OF SYNTHETIC PRODUCTS CO.
1636 WAYSIDE ROAD
CLEVELAND, OHIO 44112

ABSORBENT STORAGE - HYDRANT - FIRE EXTINGUISHER



7/16/80 WFH

Figure 15. Location of emergency equipment.

use or at least monthly. Records of these inspections are kept in the operating log.

Equipment for use in containing and cleaning up spilled hazardous wastes is stored in the plant area. A list of equipment and materials stored and maintained is listed in Table 5, along with the function of each.

First aid supplies at the first aid station include the following:

- Bandage materials
  - band aids
  - gauze pads and rolls
  - adhesive tape
  - butterfly bandages
- Antibacterial ointments
- Splints
- Aspirin
- Emetic - Syrup of Ipecac
- Local and topical anesthetics
- Eyewash bottle and solution

Protective clothing and equipment is provided to protect employees during normal and emergency operations. Hard hats, and protective eyewear are the minimum protective clothing required. Other protective clothing equipment available on site include:

Clothing/equipment
- Rubber and Neoprene boots
- Short and long rubber gloves
- Rain suits
- Extra protective eyeglasses
- Disposable respirators

This equipment is located in the plant area for easy access by personnel.

TABLE 5. MATERIAL AND EQUIPMENT FOR SPILL CONTAINMENT AND CLEANUP

Material(s)/equipment	Quantity	Substances contained/ absorbed/cleaned up	Notes
Standard industrial absorbents	A drum is placed in all plant areas where small spills are suspect.	For small spills of oil, solvents, aqueous materials. Do not use for acids or caustics unless first neutralized.	Each drum accompanied with broom (or shovel) and dustpan.
Absorbent pads	Carton (100 pads-Conwed)	In water, most insoluble or slightly soluble organics. Most materials on land. Do not use for acids.	Will float on water so are most helpful in cleaning up materials contained within the boom boundaries or in diked areas where a chemical sheen has formed on water collected within. Also, place around equipment or in areas where leakage or spillage occurs frequently (i.e., pumps, loading/unloading areas).
Submersible pump	1	For specifications on material-handling capabilities.	Can be used to remove diked liquids, etc.
55-gallon drums; steel stainless steel	Variable	Most organics (steel); acids, caustics, contaminated absorbent materials (stainless steel).	

G-6 Coordination Agreements

Sympro has made the following arrangements to assist in response to emergency situations.

1. An agreement has been made with a local disposal facility to provide a tank truck on a 24-hour basis.

2. Copies of the contingency plan have been given to the local police and fire departments, the hospital, and the state and local Emergency Response Teams.

G-7 Evacuation Plan

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow an established set of procedures. Such established procedures will be followed as closely as possible; however, in specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan for bringing the situation under control. The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation.

The facility employs a warning system with a specific alarm signal to initiate evacuation of all plant areas. In addition to the alarm, the internal telephone system is used to notify key plant personnel as to the nature of the emergency and recommended plan of action. Total plant evacuation is initiated only by the Emergency Coordinator.

A fire alarm system is installed with alarm boxes located at critical areas throughout the plant. The fire alarms can

also be used to summon aid in other emergency situations. All applicable employees are familiar with alarm box locations.

In the event plant evacuation is called for by the Emergency Coordinator, the following actions will be taken:

1. The signal for plant evacuation will be activated.

2. All gates will immediately be opened. No further entry of visitors, contractors, or trucks will be permitted. All vehicle traffic within the plant will cease to allow safe exit of personnel and movement of emergency equipment.

3. ALL personnel, visitors, and contractors will immediately leave through the exit gate.

4. No persons shall remain or reenter the location unless specifically authorized by the person or persons calling for the evacuation. In allowing this, the person in charge assumes responsibility for those persons within the perimeter. Those within the fenced area will normally only include fire brigade personnel or emergency teams.

5. ALL persons will be accounted for by their immediate supervisors. Supervisors will designate certain gates as the safest exits for his or her employees and will also choose an alternate exit if the first choice is inaccessible. To assist in this endeavor, the Emergency Coordinator will use the internal telephone system to call the area supervisor, to inform him or her of the nature of the emergency.

6. During exit, the supervisor should try to keep his or her group together. The employee parking lot is the rally point for all employees. Immediately upon exit through the gate, the highest ranking supervisor will prepare a list of all personnel at the exit gate. All other personnel who have persons reporting to them should report immediately to the front gate for final accounting.

7. Upon completion of the employee list, the supervisor in charge will hand-carry the list to the Emergency Coordinator. All other personnel will remain at the gate area.

8. Contract personnel should also be listed with the name of their company. Contract foremen should report to the front gate.

9. The names of fire brigade and/or other emergency team members involved in emergency response will be reported, in writing, to the front gate by designated response team personnel.

10. A final tally of persons will be made by the Emergency Coordinator.

11. No attempt to find persons not accounted for will involve endangering lives of others by reentry into emergency areas.

12. A designated team member at each gate will also maintain an updated list of all personnel to aid in the accountability procedure.

13. Reentry into the fenced area will be made only after clearance is given by the Emergency Coordinator. At his direction, a signal or other notification will be given for reentry into the plant.

14. In all questions of accountability, immediate supervisors will be held responsible for those persons reporting to them. Visitors will be the responsibility of those employees they are seeing. Contractors are the responsibility of those persons administering the individual contracts. Truck drivers are the responsibility of the unloading crew supervisor or the area supervisor where the truck is loading/unloading.

15. Drills are held to practice all of these procedures and are treated with the same seriousness as an actual emergency.

G-8 Required Reports [40 CFR 264.56(d) and 264.56(i)]

As required by §264.56(J), any emergency event (e.g., fire, explosion, etc.) that requires implementing the contingency plan will be reported in writing within 15 days to the EPA Regional Administrator. A reporting form for emergency events is shown in Figure 16.

REPORTING FORM FOR EMERGENCY EVENTS

Name, address, and phone number of owner or operator

Name, address, and phone number of facility

Date, time, and type of incident (e.g., fire, explosion, etc.)

Name and quantity of material(s) involved

Extent of injuries (if any)

Assessment of actual or potential hazards to human health or the environment (if applicable)

Estimated quantity and disposition of material recovered from the incident

Send to: Valdas V. Adamkus
U.S. EPA, Region V
Regional Administrator (EPA)
230 South Dearborn
Chicago, Illinois 60604

Figure 16. Sample reporting form for emergency events.

In addition to these reporting requirements for state and Federal authorities, Synpro also has internal reporting requirements. The following incidents require that an incident report be completed and returned to the safety director within 5 working days and made part of the operating record:

1. All fires or explosions.
2. Unusual gas or vapor releases
3. Chemical spills of more than 10 gallons (or smaller volumes if highly toxic materials are involved).
4. All injuries except minor cuts and bruises (all burns and chemical irritations).
5. All equipment damage due to malfunction or operating error.
6. All "near misses" of the above variety that could have had serious consequences.

G-9 Amendments to the Contingency Plan and SPCC Plan

The contingency plan will be reviewed and immediately amended, if necessary, whenever:

1. The facility permit is revised
2. The plan fails in an emergency
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary in any emergency
4. The list of emergency coordinators change
5. The list of emergency equipment changes

Synpro, prior to the submission of this application, did not have a Spill Prevention, Control and Countermeasure (SPCC)

Plan. Therefore, §264.52(b) is not applicable, and the requirements for spill prevention, control and countermeasures were addressed in various sections of this contingency plan.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT VI
CLOSURE PLAN

SYNPRO Div. of Dart Industries
U.S. EPA FACILITY ID #: OHD-077-783-603

ATTACHMENT VI

SECTION I

CLOSURE PLAN, POST-CLOSURE PLAN, AND FINANCIAL REQUIREMENTS

This section is submitted in accordance with the requirements of 40 CFR §122.25(a)(13), §264.112 through 115, and §264.178. This plan identifies all steps that will be necessary to completely close the facility at the end of its intended operating life. Partial closure is not planned and would be equivalent to final closure since there is only one hazardous waste storage area. A post-closure plan is not required because this is not a disposal facility and all wastes and residues will be removed at closure.

Synpro, a division of Dart Industries, is located in Cleveland, Ohio. The company manufactures vinyl stabilizers and metallic searates. Impure nonsalable products containing barium and cadnium are discarded and thus become hazardous wastes listed as D005 and D006, respectively. These wastes are generated before or after the filtering and drying operation in the manufacturing process. Approximately 50 percent of the hazardous wastes generated are in liquid form and the remainder are solid. Both forms are stored onsite in 55-gallon drums at the container storage building. The wastes are hauled to a permitted hazardous waste landfill or a deep well injection site by a contractor.

Hazardous waste operations at Synpro consist of a container storage building with a capacity of eighty 55-gal drums (Figure 6). Dimensions of the storage area are 30-ft by 30-ft wide. Drums may be stacked as high as 9 feet.

Synpro will retain a copy of the approved closure plan and all revisions to the plan on-site until the certification of closure has been submitted and accepted by EPA, Region V or the state regulatory agency. Synpro will notify the Regional Administrator at least 180 days prior to initiation of final closure. The closure date selected for this plan is the year 2000, however, Synpro will amend this plan if its intended operation goes beyond this date. Upon completion of closure, Synpro will submit to the Regional Administrator certification by both Synpro and a local independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

I-1 Closure Plan [40 CFR 122.25(a)(13)

I-1a Closure Performance Standard [40 CFR 264.111]

This closure plan was designed to ensure that the facility will not require further maintenance and controls, minimizes or eliminates threats to human health and the environment, and avoids escape of hazardous waste, hazardous waste constituents or contaminated rainfall to the ground, surface waters or atmosphere. If there is evidence of any spills or leaks, samples will be taken and analyzed to determine the extent of contamination in the soil and if necessary, in groundwater. An contaminated soil

will be excavated, removed, and disposed of at a permitted hazardous waste disposal facility. The following sections discuss in detail efforts to be made at Synpro to satisfy the closure performance standard.

I-1b Partial/Final Closure Activities

Partial closure activities are the same as for final closure since this facility has only one hazardous waste storage area. In the event that future circumstances or decisions force Synpro to discontinue hazardous waste container storage activities, Section I-1d of the closure plan presents procedures for final closure of the storage area. In addition, in the event that it becomes necessary to close a portion of the storage area, the procedures presented in Section I-1d will be followed. Any modifications to our existing facility equipment, structures, instruments, or procedures related to the management of the facility will results in Synpro revising the closure plan accordingly.

At a maximum, we expect the operation could consist of storage of 80 drums during the life of the facility. Section I-1c below describes the maximum inventory of wastes in storage at any given time during the operating life of the facility. Synpro will secure permission to dispose of its wastes and enter into contractual agreements with an approved hazardous waste landfill.

I-1c Maximum Waste Inventory

The maximum inventory of hazardous wastes in storage at any given time during the operating life of Synpro would be 4,400

gallons (80 drums @ 55 gal each). Any modifications to this estimate will be handled as a minor modification under 40 CFR 122.17.

I-1d Inventory Removal and Disposal or Decontamination of Equipment

All the containers in storage will be inspected to determine if they are acceptable for transportation (according to DOT regulations) of waste off-site to a disposal facility. If containers are not acceptable for transportation, the waste will be transferred to an acceptable container.

Soils in the facility are not expected to be contaminated by container storage operations. However, the possibility of contamination while removing inventory, equipment, and structure exists. An allowance has been made in the closure costs for removal and disposal of approximately 25 yd^3 of soil using a front-end loader. If evidence of possible areas of soil contamination (in the form of soil discoloration or odor) exists, a soil sampling program will be instituted to determine the extent of soil contamination in those areas. At least one soil sample will be taken near the container storage area where unloading operations occur. Auger soil boring with collected samples will be transported to a laboratory with GC/MS and atomic absorption capabilities. If contamination is found in the soil, those areas will be excavated to the depth at which insignificant contamination is detected. All soils, contaminated equipment to be disposed, and solid residues will be loaded into drums and transported by truck to a permitted hazardous waste landfill.

Prior to leaving any of the site locations undergoing decontamination, personnel protective clothing will be cleaned by removing all bulk material from the boots and spraying, washing, and scrubbing with detergent solution.

I-1d(1) Closure of Containers

All the drum containers in the Synpro container storage area will first be removed for transport to a permitted hazardous waste landfill or deep well injection. Liquids will be deep well injected and solids will be landfilled. The drums will be moved utilizing a forklift.

The container storage area (900 ft^2) will be decontaminated by sandblasting. Residues of this process will be collected for EP toxicity analysis. Alternatively, if laboratory analyses indicate that the waste is hazardous, the residue will be placed in drums for transport and disposal at an approved hazardous waste landfill. If laboratory analyses show nonhazardous the residue will be disposed at a nearby sanitary landfill. Approximately one drum of residue is anticipated to results from the container area decontamination process.

I-1e Schedule for Closure

Within 30 days after storage of the final volume of hazardous wastes, final closure activities will be initiated.

Completion of closure will be within 180 days of receipt of the final volume of hazardous waste. All cost estimates are based on a closure date in the year 2000. The Regional

Administrator will be notified by Synpro 180 days before beginning final closure. The proposed schedule for closure is shown in Figure 20. Final closure will be supervised and certified by an independent registered professional engineer, in addition to the owner or operator.

I-1f Extensions for Closure Time [40 CFR 264.133(a) and 264.113(b)]

Synpro will not require a closure time extension.

I-2 Post-Closure Plans [40 CFR 122.25(a)(13)

Post-closure care will not be required of this facility because this is not a disposal facility.

I-3 Notice in Deed and Notice to Local Land Authority [40 CFR 122.25(a)(14) and 264.119 and 264.120

Because Synpro is only a hazardous waste storage facility and not a disposal facility, notation in deed and notice to local zoning authority are not required.

I-4 Closure Cost Estimate [40 CFR 122.25(a)(15) and 264.142]

The closure cost information presented below is submitted in accordance with the requirements of 40 CFR §122.25(a)(15), §264.142, and §264.143.

An estimated $16,600 (1982 dollars) will be needed to close the Synpro hazardous waste storage facility. The closure costs are presented by activity in Table 6. Activities include removal/disposal of final waste inventory, decontamination of container storage area and equipment, decontamination of holding tank and sump equipment, and certification of closure. Cost

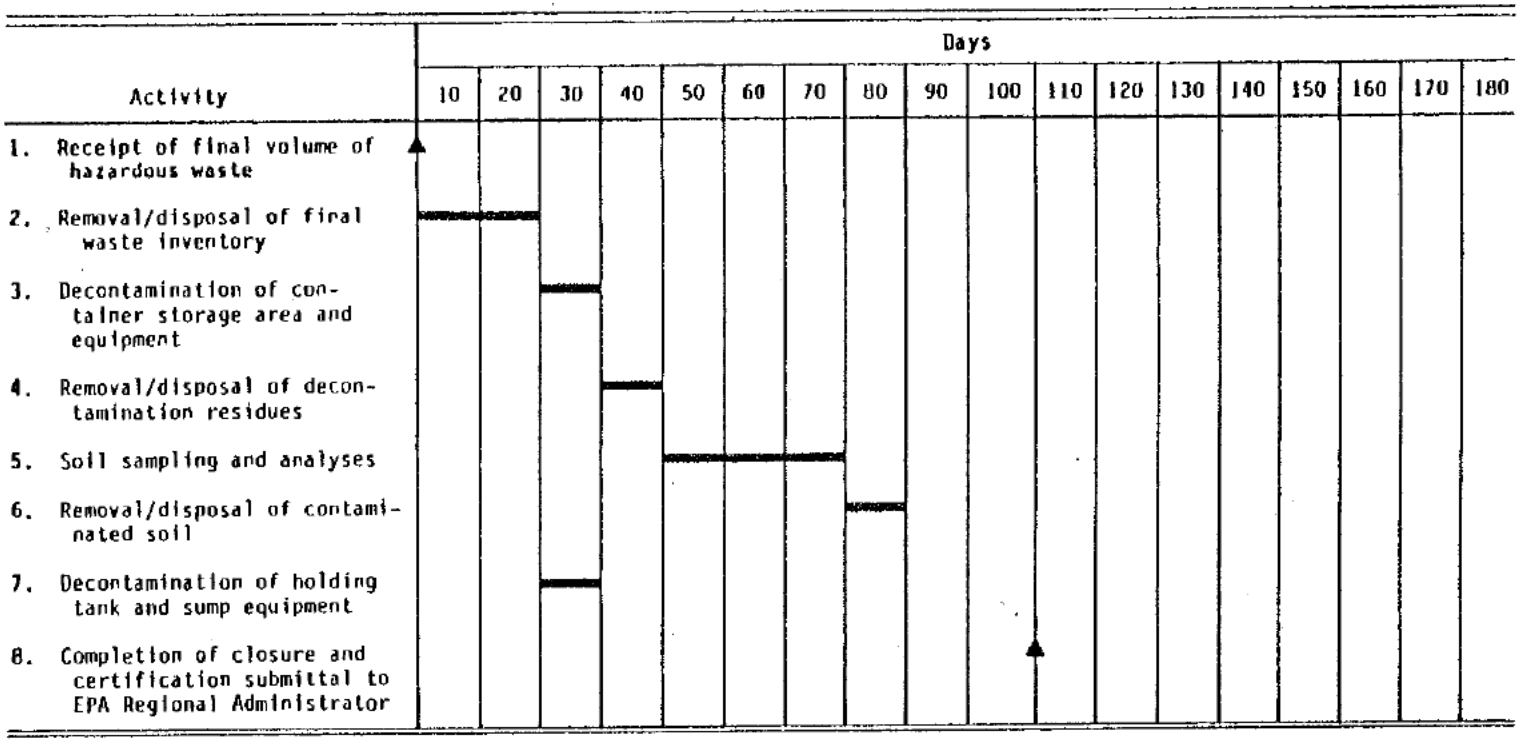


Figure 20. Closure schedule.

TABLE 6. CLOSURE COST ESTIMATE

A. Removal/Disposal of Final Waste Inventory

Liquids

1. Transfer liquid wastes to process tank for loading to bulk tanker.

   Labor, 64 hours @ $17/h — $1,100

2. Transport liquid wastes to disposal site.

   a. Labor, 2½ hours @ $52/h — $130
   b. Transportation, 2200 gal x 8.5 lb/gal = 18,700 lbs — $215
      18,700 lbs x $1.15/100 lbs = $215

3. Disposal of liquids at deepwell injection site — $770

   2200 gallons @ $0.35/gal

Solids

1. Load drums of solids on truck (includes 1 drum from decontamination operations)

   a. Labor, 1 hour @ $17/h — $17
   b. Equipment rental, 1 day @ $130/day — $130
   c. Equipment operating cost, 8 hours @ $6.25/h — $50

2. Transport drums to disposal site

   40 drums @ $36.94/drum — $1,480

3. Disposal of solids

   a. Disposal, 40 drums @ $24/drum — $960
   b. Alabama state tax, $2/drum — $80

B. Decontamination of Container Storage Area and Equipment

1. Decontamination of storage area and equipment by sand-blasting, includes labor, equipment, and materials: 900 ft² @ $1.76/ft² — $1,600*

2. Soil testing

   a. Sampling, 4 borings, 2 ft/boring, 4 hours @ $17/h — $100

* Cost for loading, transportation, and disposal is included in Item A of this table.

TABLE 6. (continued)

b.	Analyses 4 samples, each analyzed for EP toxicity, barium and cadmium @ $15/metal	$600
2.	Removal/disposal of contaminated soil (25 yd^3)	
a.	Delivery of equipment to site	$90
b.	Soil excavation/loading	$100
c.	Transportation to permitted landfill 2 trips, 575 miles/trip @ $2.80/loaded mile	$3,220
d.	Disposal of contaminated soil 25 yd^3 x 3000 lb/yd^3 x 1 ton/2000 lb = 37.5 tons 37.5 tons @ $60/ton	$2,250
C.	Decontamination of Holding Tank and Sump Equipment	
1.	Removal and transport of 800 gal of liquid wastes to disposal site (assume 20% capacity)	**
2.	Disposal of liquid at deep well injection site	
	800 gal @ $0.35/gal	$280
3.	Tank cleaning	
	Assume ½ day for tank-cleaning crew @ $525/day	$260
4.	Steam clean sump equipment	
a.	Cleaner rental, 1 day @ 33/day	$40
b.	Labor, 5 hours @ $17/h = $85	$90
D.	Certification of Closure	
1.	16 hours professional engineer @ $50/h	$800
2.	Administrative and clerical 8 h x $10/h	$80
	Subtotal	$14,442
	Contingencies @ 15%	$2,166
	Total (rounded off)	$16,600

** Cost included in Item A of this table.

estimates for facility closure were based on the following assumptions:

1) Facility personnel will be used to load wastes for transport to the disposal site

2) Liquid wastes will be transferred from drums to a tanker truck for transport to a disposal facility.

3) All waste transportation will be contracted

4) Storage pad cleaning, soil excavation, and tank cleaning will be performed by a contractor

5) Sump and auxilliary equipment will be cleaned with a steam cleaner by facility personnel

References for cost estimates are listed below:

1. Soil excavation, sandblasting, steam cleaning, and equipment rental - Robert Snow Means Company, Inc. Building Construction Cost Data, 1982.

2. Labor rates for functions performed with on-site personnel - average labor rate for facility plus fringes and overhead.

3. Transportation and disposal costs -

   - PEDCo Environmental, Inc., Data for Reviewing Closure Costs of Hazardous Waste Storgae Facilities, Draft Report. Prepared for U.S. Environmental Protection Agency. November 1982.

   - Booz-Allen and Hamilton, Inc., Review of Activities of Major Firms in the Commercial Hazardous Waste Management Industry: 1981 Update. Prepared for U.S. Environmental Protection Agency. May 1982.

   - Synpro operating experience.

This closure cost estimate will be kept on file at Synpro. It will be revised whenever a change in the closure plan affects the cost of closure. It will be adjusted annually (from the date of its original development) to reflect changes in closure cost brought about by inflation. The Department of Commerce's Annual

Implicit Prince Deflator for Gross National Product* will be used to make this adjustment.

I-5 Financial Assurance Mechanism for Closure [40 CFR Sections 122.25(a)(1), 264.143, and 264.150]

Synpro established financial assurance for closure by passing a financial test. Included as Appendix 2, is a letter from the facility's chief financial officer, an auditor's report confirming the results of the test and the auditor's opinion.

I-6 Post-Closure Cost Estimate [40 CFR Sections 122.25(a)(16) and 264.144

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

I-7 Financial Assurance Mechanism for Post-Closure [40 CFR Sections 122.25(a)(16) and 264.145]

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

I-8 Liability Insurance [40 CFR Sections 122.25(a)(17) and 264.147]

Synpro has required documents demonstrating liability insurance for sudden occurrences in the amount of $1 million per occurrence, with an annual aggregate of $2 million, exclusive of legal defense costs.

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* Published by U.S. Department of Commerce in its monthly publication, "Survey of Current Business."

RCRA FINAL PERMIT SIGN-OFF

PART I. BACKGROUND

FACILITY NAME: SYNPRO Division of Dart Industries, Inc.

FACILITY LOCATION: Cleveland, Ohio

RCRA ID NUMBER: OHD 077-783-603

TYPE OF PERMIT

X Storage	___ Treatment	___ Disposal
X Container	___ Tank	___ Injection Well
___ Tank	___ Surface Impoundment	___ Landfill
___ Waste Pile	___ Incinerator	___ Land Application
___ Surface Impoundment	___ Other (Detonation)	___ Surface Impound

PART II. REVIEW PACKAGE CONTENT

- X Final Permit w/Attachments
- X Responsiveness Summary
- X Letter to Applicant
- X Letter to Commentors
- X Administrative Record
- ___ _____

PART III. CONCURRENCES

	WASTE MANAGEMENT BRANCH	INITIALS	DATE	AGREE	DISAGREE
1.	TECH. PERMIT CONTACT, C.B. Slaustas	CBS	4/10/84	(X)	( )
2.	CHIEF, STATE TECHNICAL UNIT	DJB	4/12/84	(X)	( )
3.	for CHIEF, TP&C SECTION	DJB	4/12/84	(X)	( )
4.	for CHIEF, WASTE MAN. BRANCH	WHM	4/13/84	(X)	( )
	OFFICE OF REGIONAL COUNSEL				
5.	ASSIST. REG. COUNSEL, TALBERT 4/15	[illegible]	4/21/84	(X)	( )
6.	CHIEF, SOLID WASTE & EMER. RESPONSE BR.	MG	4/21/84	(X)	( )
7.	acting REGIONAL COUNSEL	DAH	4/23/84	(X)	( )

PART IV. APPROVAL

DJB 4/25/84

DIRECTOR, WASTE MANAGEMENT DIVISION — [illegible] 4/25/84 (✓) ( )

OH-13

cc: Section Log
ORC